

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:	Chapter 7
Mack Industries, Ltd., et al., Debtors. ¹	Bankruptcy No. 17-09308 (Jointly Administered) Honorable Carol A. Doyle
Ronald R. Peterson , as chapter 7 trustee for Mack Industries Ltd., Plaintiff, v. TTS Granite Inc., Defendant.	Adversary No. 19-00522

TRUSTEE'S MOTION FOR LEAVE TO APPEAL

Two different bankruptcy judges reviewed substantially similar complaints on motions to dismiss. One judge found that a corporation did not get reasonably equivalent value when its owners looted it, while the other found that the corporation did get reasonably equivalent value. The latter judge, who dismissed the plaintiff's claim with prejudice, improperly assumed facts outside the complaint and drew inferences in the defendant's favor. This ruling will likely affect 267 similar cases that remain pending before the bankruptcy judge. This Court should therefore grant the plaintiff leave to appeal to correct this error.

¹ The debtors, with their respective bankruptcy case numbers, are as follows: Mack Industries, Ltd. (17-09308); Oak Park Avenue Realty, Ltd. (17-16651); Mack Industries II, LLC (17-16859); Mack Industries III, LLC (17-17106); Mack Industries IV, LLC (17-17109); Mack Industries V, LLC (18-03445); and Mack Industries VI, LLC (18-03451).

1. BACKGROUND.

The question this appeal presents is whether the bankruptcy judge erred in finding—on a motion to dismiss and without evidence—that a debtor received reasonably equivalent value when the debtor’s owners pillaged it to benefit themselves and their other entities. The bankruptcy judge below made such a finding and, on that basis, dismissed a constructive fraudulent transfer claim with prejudice. Order (attached as Ex. A); Mem. Op. (attached as Ex. B), at 5–11. This was an error, and its prompt correction will speed the resolution of this case and 267 others that remain pending below.

1.1. General background.

This case is one of 436 lawsuits brought by Ronald R. Peterson, not individually, but as trustee (the “Trustee”) for the bankruptcy estates of Mack Industries Ltd. (the “Debtor”) and related debtors, seeking to avoid and recover fraudulent obligations and transfers. The parties resolved nearly 40% of these cases, but there are 268 cases still pending before the bankruptcy judge who issued the order subject to appeal and two cases still pending before a different bankruptcy judge.

James K. McClelland and his son James H. McClelland owned the Debtor and many other entities, and they used them to run several different real-estate related businesses. The Debtor had financial difficulties, so the McClellands caused the Debtor to file a voluntary chapter 11 bankruptcy case on March 24, 2017. The bankruptcy court converted the Debtor’s case to a chapter 7 bankruptcy case, and the Trustee serves as the trustee in that case and in six other cases for related debtors. Creditors have filed proofs of claim alleging that these debtors owe tens of millions of dollars in unpaid debt.

A chapter 7 trustee has several statutory duties, including the duty to “collect and reduce to money the property of the estate for which such trustee serves” and to distribute that money to creditors. 11 U.S.C. §§ 704(a)(1), 726. As part of this

process, a trustee may avoid and recover fraudulent transfers under federal or state law. *Id.* § 548 (trustee may avoid fraudulent transfers and obligations); *id.* § 544(b) (trustee may avoid any transaction that a creditor may avoid under “applicable law”); 740 Ill. Comp. Stat. 160/1–12 (creditors may avoid transactions under the Illinois Uniform Fraudulent Transfer Act); 11 U.S.C. § 550 (trustee may recover from defendant value of avoided transaction). A trustee may avoid as a fraudulent transfer any obligation that a debtor incurred or transfer that a debtor made “without receiving a reasonably equivalent value in exchange for the transfer or obligation” and while insolvent or in an otherwise fragile financial condition. 740 Ill. Comp. Stat. 160/5(a)(1). *Accord* 11 U.S.C. § 548(a)(1)(B).

1.2. The complaint in this case.

In his complaint, the Trustee alleged the following:

James K. McClelland owned the Debtor and managed it with his son James H. McClelland. Am. Compl. (attached as Ex. C), at ¶¶ 6–7. The McClellands used TTS Granite Inc., a Chicagoland stone vendor, to fabricate and install granite and related products in real estate owned by the McClelland family, by the McClelland family’s other entities, and by others. *Id.* ¶¶ 13–14.

Between September 13, 2013, and March 27, 2015, the McClellands caused the Debtor to pay TTS \$317,700.65 for granite, related products, and installation services to improve parcels of real estate that the Debtor did not own. *Id.* ¶ 66, ex. A. The McClellands did so to benefit themselves and their other entities, who owned the improved parcels of real estate. *Id.* ¶ 75. The Debtor had no need or legitimate business purpose to pay for goods or services that TTS provided to the McClellands and their other entities.

The McClellands caused the Debtor to make the payments at issue as part of a larger scheme to hinder, delay and defraud the Debtor’s creditors, including American Residential Leasing Company LLC. *Id.* ¶¶ 13–63. Uniquely, the Debtor’s

agent admitted to the Debtor's fraudulent intent. *Id.* ¶ 27 ("Specifically, in June 2014, Workman told Byce that, absent a modification, the Debtor would transfer its assets to related entities for nothing in return to hinder American Residential's ability to exercise its legal remedies as a creditor or otherwise."). In addition, many badges of fraud exist with respect to the obligations and transfers at issue. *See id.* ¶¶ 97–100; 740 Ill. Comp. Stat. 5(b) (providing non-exclusive list of factors to consider in determining actual intent). The Debtor made the payments while it was insolvent or otherwise in a precarious financial condition. *Id.* ¶¶ 80–90. Because the McClellands looted the Debtor, using its money to buy goods and services from TTS for themselves and their other entities, the Debtor did not get anything in return—that is, it did not get reasonably equivalent value. *Id.* ¶¶ 72–79.

Based on these allegations and others, the Trustee seeks to avoid and recover the payments that the Debtor made to TTS as fraudulent transfers. TTS responded with a motion to dismiss the Trustee's complaint on various grounds, including failure to state a claim.

1.3. The complaint in the *River West* case.

The McClellands' pillaging of the Debtor was not confined to the transactions with TTS. The Trustee filed a total of 436 lawsuits seeking to avoid fraudulent and preferential transactions that the Debtor had to others. The defendant in one of those other cases was River West Realty Ltd. Am. Compl. (attached as Ex. D). The fundamental fact pattern in the *River West* case was the same as in this case: the McClellands used River West to obtain services for their other entities, and they caused the Debtor to pay for those services while it was insolvent. *Id.* ¶¶ 66–96. Many of the same allegations appear in the *River West* complaint as in the *TTS* complaint. *Compare* Ex. C *with* Ex. D.

The judge hearing the bulk of the Trustee's lawsuits recused herself from the *River West* case, which was reassigned to another bankruptcy judge. Like TTS,

River West filed a motion to dismiss on various grounds, including failure to state a claim.

1.4. The judges' rulings.

The *River West* judge ruled first. Order (attached as Ex. E). As relevant to this appeal, the judge ruled that when the McClellands looted the Debtor, the Debtor did not receive reasonably equivalent value in exchange:

Defendant also argues that Trustee merely states Defendant did not receive reasonably equivalent value without anything to support that statement. Again, the Complaint shows otherwise. Trustee specifically alleges that “the real estate that River West located was acquired by Mack Industries II LLC, Mack Industries III LLC, Mack LOC I LLC, Wheelhouse Investments I LLC, and others.” Trustee also alleges that “[b]ecause the Debtor did not own the real estate that River West located, Debtor did not benefit at all from River West’s services.” Finally, Trustee also alleges Debtor was insolvent when it made the transfers, citing Debtor’s books and records. Thus, Trustee has pled his claim for constructive fraud under Count I with the requisite specificity the Federal Rules of Civil Procedure demand, and he supported each element of constructive fraud with proper factual allegations. Defendant’s motion is therefore denied with respect to Count I.

Id. at 5 (citations omitted).

Later, in the *TTS* case that is the subject of this appeal, the bankruptcy judge ruled that the Debtor *did* receive reasonably equivalent value when the McClellands looted it because it “got what it paid for.” Ex. B, at 10. In coming to this conclusion, the bankruptcy judge made several factual findings that contradicted the Trustee’s complaint:

Determining whether a debtor received reasonably equivalent value for the transfer involves a three-part inquiry: (1) did the debtor receive some value, (2) was the value received in exchange for the transfer by the debtor,

and (3) did the value received by the debtor have a reasonable equivalence to what the debtor transferred. Here, the trustee does not dispute that Mack ordered the goods and services and paid a reasonable price for them, so the second and third inquiries are not contested. The parties dispute whether the facts alleged can establish that *Mack* received value when TTS fabricated and installed granite at the direction of Mack in properties owned by third parties.

...

Here, the trustee does not contend that Mack paid TTS more than the granite was worth or that Mack paid the debt of another party. Instead, the trustee argues that Mack received nothing even though TTS provided exactly what Mack paid for. In effect, the trustee seeks to make TTS pay, literally, for Mack's decisions regarding where to install the purchased granite. The trustee's argument fails.

As explained above, in determining whether Mack got reasonably equivalent value, the court must examine only the specific transactions at issue, not Mack's overall financial condition or any fraudulent scheme that Mack's management might have been perpetrating. It is undisputed that TTS provided real value to Mack for the payments it received. Mack ordered the stonework and directed where it was installed. TTS performed the work as directed by Mack and was paid a reasonable amount for its work. Like the airline tickets purchased in *Think Retail*, Mack got what it paid for in each transaction: the right to have granite fabricated and installed as it directed. The fact that Mack may have used the granite to benefit others or that Mack may have been engaging in an overall scheme to rid itself of assets does not diminish the value TTS provided to Mack. Under the facts alleged in the amended complaint, TTS provided reasonably equivalent value so the transfers were not constructively fraudulent.

Id. at 6–10 (citations omitted; emphasis in original).

Contrary to the judge's ruling, the Trustee *did* dispute that "TSS provided real value to Mack for the payments it received." The Trustee alleged that the McClellands paid for goods and services using the Debtor's money, but that the Debtor did not get anything in return because TTS provided the goods and services to entities other than the Debtor. Nowhere in the complaint did the Trustee allege that the Debtor ordered the goods and directed TTS to install those goods in other properties. Nowhere does the Trustee allege that the Debtor received the right to have granite fabricated and installed as it directed. Instead, the Trustee alleged that the Debtor paid invoices that TTS issued, and that these invoices were for goods and services that TTS provided to third parties and not the Debtor. Ex. C, ¶¶ 66–79. In reaching her conclusions, the bankruptcy judge went beyond the facts alleged in the complaint and drew inferences in TTS's favor.

The bankruptcy judge also found that the Debtor was not paying others' debts, but the invoices that TTS attached to its motion to dismiss contradict the judge's finding. Many are "billed to" individuals and entities other than the Debtor: Mack Estates, Jim and Jennifer McClelland, and Mack Construction Corporation. Excerpts from Mot. to Dismiss (attached as Ex. F), at ex. 1. There is no argument that these were the Debtor's debts. Even the invoices that are "billed to" the Debtor are just invoices, not irrefutable proof that *the Debtor* ordered the goods and directed them to be installed somewhere, or that *the Debtor* received reasonably equivalent value for doing so. TTS could have put anyone's name in the "billed to" box. Again, the bankruptcy judge relied on facts outside the complaint and drew inferences in TTS's favor.

Even if one could infer that the Debtor did retain some right or control over the goods, there was no evidentiary basis to conclude that this limited right is equivalent to actually receiving the granite and services for which the Debtor paid. Several of the opinions that the bankruptcy judge relied on were rulings on summary judgment, where the judge had an opportunity to weight the parties'

evidence. *Trauner v. Delta Air Lines Inc. (In re Think Retail Sols. LLC)*, 2019 Bankr. LEXIS 2031, at *1–3, 2019 WL 2912717 (Bankr. N.D. Ga. Jul. 5, 2019); *Reinbold v. Morton Cmty. Bank (In re Mid-Illini Hardwoods LLC)*, 576 B.R. 598, 600 (Bankr. C.D. Ill. 2017). Here, the judge was presented with a motion to dismiss: the parties had not yet had an opportunity for discovery or to present evidence. It was not proper for the bankruptcy judge to make a factual finding comparing the value of two disparate property rights when the case was in this posture.

Further, even if the Debtor did order the goods, it did not get reasonably equivalent value for doing so. Obligations are avoidable as much as transfers are, and “if the court avoids an obligation under section 548 or it is otherwise not binding on the debtor, transfers made by the debtor on account of that obligation are not made for reasonably equivalent value, and may be set aside as actually or constructively fraudulent if the other requirements for actual or constructive fraud are met.” Collier on Bankruptcy ¶ 548.03 (16th ed. 2020). The Trustee alleged that the Debtor did not get any benefit by incurring obligations that benefitted only third parties—the McClellands and their other entities—while stiffing its own creditors.

In reaching the conclusion that a company whose owners pillaged it “got what it paid for,” the bankruptcy judge assumed facts not in the Trustee’s complaint and drew inferences in TTS’s favor rather than the Trustee’s. This was not proper on a motion to dismiss, so this Court should grant the Trustee leave to appeal the bankruptcy judge’s ruling.

2. DISCUSSION.

With leave of court, the district court has jurisdiction over appeals from a bankruptcy court’s interlocutory orders and decrees. 28 U.S.C. § 158(a)(3). To appeal from a bankruptcy court’s interlocutory order, a party must file a notice of appeal and a motion for leave to appeal. Fed. R. Bankr. P. 8004(a).

Motions for leave to appeal are evaluated using the standard for certification of non-bankruptcy cases for appeal under 28 U.S.C. § 1292(b). *In re IFC Credit*, 2010 U.S. Dist. LEXIS 31506, at *6–7, 2010 WL 1337142 (N.D. Ill. Mar. 31, 2010). Under that standard, leave to appeal will be granted when an order “involves a controlling question of law as to which there is substantial ground for difference of opinion and ... an immediate appeal from the order may materially advance the ultimate termination of the litigation” 28 U.S.C. § 1292(b). These factors are present here.

2.1. This appeal involves a controlling question of law.

In this case, the bankruptcy judge applied the wrong legal standard when evaluating whether the Trustee had pleaded that the debtor did not receive reasonably equivalent value. In evaluating a complaint on a motion to dismiss, the court must construe the complaint in the light most favorable to the plaintiff, accept well-pleaded facts as true, and draw all inferences in the plaintiff’s favor. *Reynolds v. CB Sports Bar Inc.*, 623 F.3d 1143, 1146 (7th Cir. 2010). A complaint may not be dismissed “based on a judge’s disbelief of a complaint’s factual allegations.” *Neitzke v. Williams*, 490 U.S. 319, 327 (1989).

The bankruptcy judge concluded that the Debtor “got what it paid for” and dismissed the Trustee’s constructive fraudulent transfer claim with prejudice based on that conclusion. In reaching this conclusion, the bankruptcy judge relied on facts that were not in the Trustee’s complaint and drew inferences in TTS’s favor rather than the Trustee’s. In doing so, the bankruptcy judge applied the incorrect legal standard for motions to dismiss. Therefore, a controlling question of law is at issue in this appeal.

2.2. There is substantial ground for difference of opinion.

Two different bankruptcy judges reviewed substantially similar complaints on motions to dismiss. The judge in the *River West* case reviewed the Trustee’s

allegations and held that they were enough to plead lack of reasonably equivalent value and to state a claim to avoid constructive fraudulent transfers. The judge in the *TTS* case came to the opposite conclusion, holding that the Trustee not only did not plead enough, but could not plead enough because “the premise of his claim is faulty.” Ex. B, at 10–11. One claim survived the motion to dismiss, while its twin was dismissed with prejudice. These conflicting rulings illustrate that there is substantial ground for difference of opinion regarding the Trustee’s constructive fraudulent transfer claim.

2.3. An immediate appeal will materially advance the litigation.

The issue of whether a debtor received reasonably equivalent value is relevant to other claims that remain pending in the case: the Trustee’s actual fraudulent transfer claim and TTS’s likely good-faith defense. An immediate appeal will advance this case, as well as the 267 other similar cases pending before the bankruptcy judge below.

A trustee may avoid obligations and transfers that the debtor made “with actual intent to hinder, delay, or defraud any creditor of the debtor.” 740 Ill. Comp. Stat. 160/5(a)(1). *Accord* 11 U.S.C. § 548(a)(1)(A). In determining intent, “consideration may be given, among other factors,” to certain statutory badges of fraud, including “whether ... the value of the consideration received by the debtor was reasonably equivalent to the value of the asset transferred or the amount of the obligation incurred.” 740 Ill. Comp. Stat. 160/5(b)(8). While the presence or absence of a single badge of fraud is not dispositive in and of itself, *Levit v. Spatz (In re Spatz)*, 222 B.R. 157, 168 (N.D. Ill. 1998), the judge’s ruling on reasonably equivalent value in the constructive fraud context will undoubtedly affect the actual fraud analysis.

Also, TTS will likely assert a good-faith defense: an actual fraudulent transfer “is not voidable ... against a person who took in good faith and for a reasonably

equivalent value” 740 Ill. Comp. Stat. 160/9(a). *Accord* 11 U.S.C. § 548(c). While TTS did not raise this affirmative defense in its motion to dismiss, other defendants did. In a separate case that the Trustee is also seeking to appeal along with this one, *Peterson v. Capital One N.A., et al.*, the defendant raised the good-faith defense in its motion to dismiss, and the bankruptcy judge held that the value element had been established by the Trustee’s complaint. Ex. G, at 21–22.

“Reasonably equivalent value” is not a discrete issue that can be separated for later appeal. The bankruptcy judge’s ruling touches on all the remaining aspects of the Trustee’s case. If the parties litigate the actual fraudulent transfer claim, and the Trustee later appeals and wins on the reasonably equivalent value issue, then the parties will not just have to litigate the constructive fraud claim, but they will also likely have to relitigate the actual fraud claim and good-faith defense as well. If this issue is decided now, however, then the parties can proceed with resolving the rest of the case in the ordinary course.

This appeal will also affect many of the other 267 cases pending before the bankruptcy judge below. These cases are based on the same general fact pattern as the one at issue in this case, and it is likely that the judge’s ruling here will affect the outcome in those cases as well. A decision now in this case will help the parties move forward in those cases more quickly and efficiently.

Wherefore, the Trustee respectfully requests that the Court grant him leave to appeal and grant any other relief as this Court may deem appropriate.

Dated: November 24, 2020

Respectfully submitted,

Ronald R. Peterson, as chapter 7
trustee for Mack Industries Ltd.

By: /s/ Jeffrey K. Paulsen
One of His Attorneys

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

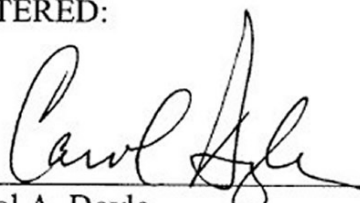
In re:)	Chapter 7
)	
Mack Industries, Ltd., et al.,)	
)	No. 17 B 09308
)	
Debtor.)	
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)	
Ronald R. Peterson, as Chapter 7 Trustee,)	
)	
Plaintiff,)	
)	
v.)	No. 19 A 00522
)	
TTS Granite Inc.,)	
)	
Defendant.)	Judge Carol A. Doyle

Order Granting in Part and Denying in Part Defendant's Motion to Dismiss

For the reasons stated in the Memorandum Opinion entered November 10, 2020, the motion of TTS Granite Inc. to dismiss the Amended Complaint is granted in part and denied in part. The motion is granted regarding the claim in Count I for fraudulent transfer based on constructive fraud. This claim is dismissed with prejudice. The motion is denied regarding the claim in Count II for fraudulent transfer based on actual fraud.

Dated: November 10, 2020

ENTERED:



Carol A. Doyle
United States Bankruptcy Judge

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION**

In re:)	Chapter 7
)	
Mack Industries, Ltd., et al.,)	
)	No. 17 B 09308
)	
Debtor.)	
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)	
Ronald R. Peterson, as Chapter 7 Trustee,)	
)	
Plaintiff,)	
)	
v.)	No. 19 A 00522
)	
TTS Granite Inc.,)	
)	
Defendant.)	Judge Carol A. Doyle

Memorandum Opinion

Chapter 7 trustee Ronald Peterson filed this adversary proceeding against defendant TTS Granite Inc. (“TTS”) seeking to recover alleged fraudulent transfers made to it by debtor Mack Industries Ltd. (“Mack”). The trustee alleges that Mack ordered granite counter tops from TTS and paid for them but had them installed in properties that Mack did not own. He contends that these transfers were part of a fraudulent scheme to deplete Mack’s assets.

TTS moved to dismiss the amended complaint. It argues that the trustee has not alleged a plausible claim for fraudulent transfer based on either constructive fraud or actual fraud. TTS is correct regarding the claim based on constructive fraud, which will be dismissed. TTS’s motion

to dismiss the claim based on actual fraud will be denied.

1. Background and Amended Complaint

The trustee filed a complaint against TTS alleging two claims to avoid fraudulent transfers. The court granted a motion to dismiss a similar adversary proceeding in *Peterson v. McClean (In re Mack Industries, Ltd.)*, No. 19-ap-00433, 2019 Bankr LEXIS 3603 (Bankr. N.D. Ill. Nov. 20, 2019). The complaint in this case was very similar to the complaint in *McClean*. The trustee consented to the dismissal of his complaint against TTS. He was granted leave to amend and he filed the amended complaint. TTS now moves to dismiss the amended complaint.

In the amended complaint, the trustee again alleges two claims for fraudulent transfer. He seeks to recover payments of approximately \$317,000 that Mack made to TTS between September 2013 and March 2015. Exhibit A to the amended complaint contains a list of transfers totaling \$391,000. Approximately \$74,000 of the payments were for granite installed in properties owned by Mack or one of Mack's unsecured creditors, American Residential Leasing Company LLC. The trustee does not seek to recover those payments. The trustee alleges that the remaining \$317,000 in payments were for granite fabricated and installed by TTS in properties owned by parties other than Mack or American Residential.

In Count I, the trustee alleges that the \$317,000 in payments were constructively fraudulent under the Illinois Uniform Fraudulent Transfer Act and § 548(a)(1)(B) of the Bankruptcy Code. He contends that the granite was installed in properties owned by third parties and therefore provided no value to Mack. In Count II, the trustee alleges that Mack made the payments with actual intent to defraud. He bases this claim primarily on a statement allegedly

Although Mack owned some real estate after 2013, “the vast majority of real estate acquired for flipping was acquired by the new entities.” Amended Complaint ¶ 47. Mack also transferred real estate from itself to the new entities. Amended Complaint ¶¶ 47, 48. The McClellands thereby reduced the assets “that the debtor had that could be collected by American Residential.” Amended Complaint ¶ 48. Mack also “drew down” on its own assets to benefit the other entities. Amended Complaint ¶ 49. It paid contractors to work on and improve real property owned by the other entities, and paid bank loans incurred by the other entities. Complaint ¶ 50. The McClellands also “extracted” at least \$10.7 million in cash from Mack and other entities. Amended Complaint ¶ 52. Mack concealed its dissipation from American Residential. After June 2014, it failed to provide American Residential with Quarterly Statements required under the Agreement detailing its income. Amended Complaint ¶¶ 54, 55. American Residential tried to take over its own properties in 2016 but Mack refused to provide

information about the subtenants. Amended Complaint ¶ 58. In March 2016, American Residential sued Mack and related entities in state court. Amended Complaint ¶ 37.

2. Constructive Fraud

TTS argues that the claim in Count I based on constructive fraud must be dismissed because the trustee has failed to allege an essential element of his claim: that Mack did not receive reasonably equivalent value for the payments. TTS asserts, and the trustee does not contest, that the complaint and attachments show that Mack ordered the granite and that TTS fabricated and installed it in accordance with Mack's directions. TTS therefore contends that Mack received reasonably equivalent value for the payments. It argues that what Mack chose to do with the goods and services does not affect the objective value it gave Mack in exchange for the money. The trustee responds that *Mack* did not receive any value because the granite was installed in properties that Mack did not own. TTS is correct. Mack received reasonably equivalent value for its payments to TTS.

The trustee brings his constructive fraud claim under the Illinois Uniform Fraudulent Transfer Act, 740 ILCS 160/5(a)(2), 6(a), and 8(a), via § 544(b)(1) of the Bankruptcy Code, as well as under § 548(a)(1)(B) of the Bankruptcy Code. A plaintiff seeking to avoid a fraudulent transfer based on constructive fraud under § 548(a)(1)(B) must plead and prove the following: (1) a transfer of the debtor's property or interest; (2) made within two years before the date the bankruptcy petition was filed; (3) for which the debtor received less than a reasonably equivalent value in return; and (4) that the debtor (a) was insolvent on the date of the transfer or became insolvent as a result, (b) engaged in business or a transaction as a result of which the debtor's

remaining capital was unreasonably small, or (c) intended to incur, or should have known he would incur, debts he would be unable to pay. *KHI Liquidation Trust v. C. Goshy Enterprises, Inc. (In re Kimball Hill, Inc.)*, No. 10-ap-998, 2012 WL 5880657, at *5 (Bankr. N.D. Ill. Nov. 19, 2012); *Cox v. Grube (In re Grube)*, No. 09-ap-8111, 2012 WL 3263905, at *4 (Bankr. C.D. Ill. Aug. 9, 2012); *Martino v. Edison Worldwide Capital (In re Randy)*, 189 B.R. 425, 440 (Bankr. N.D. Ill. 1995). Under the IUFTA, the elements are the same but the statute of limitations is four years. 740 ILCS 160/5, 160/10; *Reinbold v. Morton Community Bank (In re Mid-Illini Hardwoods, LLC)*, 576 B.R. 598, 604 (Bankr. C.D. Ill 2017); see *Zimmerman v. Paulsen*, 524 F. Supp. 2d 1077 (N.D. Ill. 2007).

The standard for reasonably equivalent value is the same under Illinois law and § 548(a). *Baldi v. Samuel Son & Co, Ltd.*, 548 F.3d 579, 580 (7th Cir. 2008); *Creditor's Comm. of Jumer's Castle Lodge, Inc. v. Jumer (In re Jumer's Castle Lodge Inc.)*, 472 F.3d 943, 947 (7th Cir. 2007) (“Because the IUFTA is a uniform act, we may look to cases decided under 11 U.S.C. § 548, as well as cases interpreting other states’ versions of the [UFTA] to determine the meaning of the phrase ‘reasonably equivalent value.’”).¹

Determining whether a debtor received reasonably equivalent value for the transfer involves a three-part inquiry: (1) did the debtor receive some value, (2) was the value received in exchange for the transfer by the debtor, and (3) did the value received by the debtor have a reasonable equivalence to what the debtor transferred. *Mid-Illini Hardwoods*, 576 B.R. at 604. Here, the trustee does not dispute that Mack ordered the goods and services and paid a

¹ TTS argues, and the trustee concedes, that all but one transaction alleged in the complaint is barred by the two year limitations period for claims under § 548(a).

reasonable price for them, so the second and third inquiries are not contested. The parties dispute whether the facts alleged can establish that *Mack* received value when TTS fabricated and installed granite at the direction of Mack in properties owned by third parties.

The focus of the inquiry regarding reasonably equivalent value “must be on the specific transaction the trustee seeks to avoid, *i.e.*, the *quid pro quo* exchange between the debtor and the transferee, rather than an analysis of the transaction’s overall value to a debtor as it relates to the welfare of the debtor’s business.” *Balaber-Strauss v. Sixty-Fve Brokers (In re Churchill Mort. Inv. Corp.)*, 256 B.R. 664, 678 (Bankr. S.D.N.Y. 2000). Courts seek to ensure that there is an exchange of property that is a fair equivalent and “not disproportionately small as compared with the value of the property or obligation obtained.” *Id.* Courts examine “the objective value of the goods and services provided rather than the impact the goods and services had on the bankrupt enterprise.” *Trauner v Delta Air Lines, Inc. (In re Think Retail Solutions, LLC)*, No.17-ap-5078, 2019 WL 2912717 at *16 (Bankr. N.D. Ga. 2019) (quoting *Orlick v. Kozyak (In re Financial Federated Title & Trust, Inc.)*, 872 F.3d 1235, 1248 (11th Cir. 2017) and *Merrill v. Allen (In re Universal Clearing House Co.)*, 60 B.R. 985, 998-99 (D. Utah 1986)); *PSN Liquidating Trust v. Intelsat Corp (In re PSN USA, Inc.)*, 615 F. App’x 925, 932 (11th Cir. 2015) (the debtor may receive value even if the transfer increases its insolvency). “[U]nder § 548, in assessing the “value” of property, goods or services provided directly to the debtor, the question is not whether the debtor subjectively benefitted from the property it received; the operative question is whether the property, goods, or serviced provided had objective value.” *McHenry v. Dillworth (In re Caribbean Fuels Am., Inc.)*, 688 F. App’x 890, 894-95 (11th Cir. 2017).

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The analysis regarding reasonably equivalent value does not change when a third party benefits from the transfer. In *Think Retail*, 2019 WL 2912717, the court held that a debtor received reasonably equivalent value from an airline when the debtor's principal purchased airline tickets for her personal use and the personal use of others. The debtor got reasonably equivalent value for the airline tickets because it controlled all the rights it purchased from the airline, including the right to a seat on a flight, the right to designate the name of the passenger for the ticket, the right to cancel the flight, and the right to modify the scheduled travel date and destination. The use of those rights by third parties did not negate the objective value given by the airline to the debtor.

In fact, even when a debtor pays the debt of another party, it may nevertheless receive reasonably equivalent value. Though the general rule is that a debtor does not receive reasonably equivalent value by paying the debt of a third party, courts still examine the facts and circumstances to determine whether the debtor indirectly got reasonably equivalent value, such as through multi-party transactions. *Mid-Illini Hardwoods*, 576 B.R. at 607.

Here, the trustee does not contend that Mack paid TTS more than the granite was worth or that Mack paid the debt of another party. Instead, the trustee argues that Mack received nothing even though TTS provided exactly what Mack paid for. In effect, the trustee seeks to make TTS pay, literally, for Mack's decisions regarding where to install the purchased granite. The trustee's argument fails.

As explained above, in determining whether Mack got reasonably equivalent value, the court must examine only the specific transactions at issue, not Mack's overall financial condition or any fraudulent scheme that Mack's management might have been perpetrating. It is

The trustee has failed to cite a single case in which an arms-length transaction between a debtor and a vendor in which a reasonable amount was paid for goods and services actually provided was avoided as constructively fraudulent based on what the debtor chose to do with those goods and services. Fraudulent conveyance law is grounded in equity and is designed to enable a trustee or creditors to avoid a transfer when the transferee received more from the debtor than the debtor received from the transferee. *Churchill Mort. Inv.*, 256 B.R. at 682. It is not designed to turn every vendor into an insurer to creditors against corporate malfeasance. Here, Mack got what it paid for; it received reasonably equivalent value.

The trustee has not pled facts that support the essential element of lack of reasonably equivalent value.² Nor will the trustee be able to amend to fix this defect; the premise of his

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rather than providing some specific facts to ground those legal claims” *Brooks v. Ross*, 578 F.3d 574, 581 (7th Cir. 2009).

When alleging fraud, however, Rule 9(b) requires more. A plaintiff must “state with particularity the circumstances constituting fraud” Fed. R. Civ. P. 9(b); Fed. R. Bankr. P. 7009. Particularity means “the who, what, when, where and how: the first paragraph of any newspaper story.” *Katz v. Household Int’l, Inc.*, 91 F.3d 1036, 1040 (7th Cir. 1996). The particularity standard is “somewhat relaxed” for a bankruptcy trustee because he may lack information that the debtor would have. *See, e.g., In re Grube*, 500 B.R. 764, 776 (Bankr. C.D. Ill. 2013); *Marwil v. Oncale (In re Life Fund 5.1 LLC)*, No. 10-ap-42, 2010 WL 2650024 (Bankr. N.D. Ill. June 30, 2010). Nevertheless, the trustee must still comply with the “who, what, when, where and how test” of particularity. *See Life Fund 5.1*, 2010 WL 2650024 (fraudulent transfer claims filed by a trustee were dismissed for failure to plead the precise amount of the transfer, the date of the transfer, and the debtor from whose account the money was transferred).

Fraudulent intent may be shown through direct evidence or circumstantial evidence, often referred to as “badges of fraud.” As explained in *Friedrich v Mottaz*, “[d]irect proof of actual intent to defraud is not required—indeed, it would be hard to come by—and a trustee can prove actual intent by circumstantial evidence.” 294 F.3d 864, 869-70 (7th Cir. 2002). Courts often look to “badges of fraud” as circumstantial evidence. *Id.* These “badges” include: whether the debtor retained possession or control of the property after the transfer, whether the transferee shared a familial or other close relationship with the debtor, whether the debtor received consideration for the transfer, whether the transfer was disclosed or concealed, whether the debtor made the transfer before or after being threatened with suit by creditors, whether the

The trustee supported his allegation about the Workman threat with various other allegations regarding the scheme to defraud. These allegations, described above, include that (1) the McClellands began creating many new entities to conduct the kind of business Mack had previously conducted, (2) they transferred real property owned by Mack to these new entities for no consideration, (3) Mack “drew down” on its own assets to benefit the other entities, (4) Mack paid contractors to do work on properties owned by the other entities, (5) Mack paid the loans of

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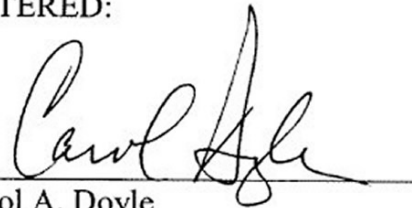
4. Conclusion

The motion to dismiss the claim in Count I for fraudulent transfer based on constructive fraud will be granted. The claim will be dismissed with prejudice.

The motion to dismiss the claim in Count II for fraudulent transfer based on actual fraud will be denied.

Dated: November 10, 2020

ENTERED:

A handwritten signature in black ink, appearing to read "Carol A. Doyle", written over a horizontal line.

Carol A. Doyle
United States Bankruptcy Judge

EXHIBIT C

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:	Chapter 7
Mack Industries, Ltd., et al., Debtors. ¹	Bankruptcy No. 17-09308 (Jointly Administered) Honorable Carol A. Doyle
Ronald R. Peterson , as chapter 7 trustee for Mack Industries Ltd., Plaintiff, v. TTS Granite Inc., Defendant.	Adversary No. 19-00522

AMENDED COMPLAINT

1. Mack Industries Ltd. (the “Debtor”) transferred \$317,700.65 to TTS Granite Inc. not for its own benefit, but for the benefit of other entities. The Debtor got no value for the transfers, which it made while insolvent and as part of a scheme to hinder, delay, and defraud its creditors, including American Residential Leasing Company LLC. Therefore, Ronald R. Peterson, as chapter 7 trustee for the Debtor, (the “Trustee”) seeks to avoid and recover those transfers for the estate’s benefit.

¹ The debtors, with their respective bankruptcy case numbers, are as follows: Mack Industries, Ltd. (17-09308); Oak Park Avenue Realty, Ltd. (17-16651); Mack Industries II, LLC (17-16859); Mack Industries III, LLC (17-17106); Mack Industries IV, LLC (17-17109); Mack Industries V, LLC (18-03445); and Mack Industries VI, LLC (18-03451).

JURISDICTION AND VENUE

2. This adversary proceeding arises in the chapter 7 bankruptcy case of Mack Industries Ltd., pending before this Court as case number 17-09308.

3. Pursuant to 28 U.S.C. § 1334(b), this Court has subject matter jurisdiction over this proceeding, which is referred here pursuant to 28 U.S.C. § 157(b) and Local Rule 40.3.1(a) of the United States District Court for the Northern District of Illinois.

4. This is a core proceeding under 28 U.S.C. § 157(b)(2)(H), and this Court has constitutional authority to enter final judgments and orders herein. If a court determines that any portion of this proceeding is not a core proceeding or that a bankruptcy judge does not have constitutional authority to enter final judgments in this proceeding, the Trustee consents, pursuant to 28 U.S.C. § 157(c), to a bankruptcy judge hearing and finally determining the proceeding and entering appropriate orders and judgments.

5. This Court is the proper venue for this adversary proceeding pursuant to 28 U.S.C. §§ 1408 and 1409.

GENERAL ALLEGATIONS

1. The McClelland family entities.

6. The Debtor was created in 1998 and was owned by James K. McClelland.

7. James K. McClelland and his son James H. McClelland managed the Debtor.

8. One of the Debtor's main lines of business was flipping houses: the Debtor would acquire real estate, rehab it, and then sell it or rent it to generate income.

9. Prior to 2013, the McClellands operated the real estate business in the Debtor's name, except for certain lines of business or opportunities they pursued in the names of Mack Investments I LLC, an entity owned by James K. McClelland and created in 2009; 2300-16 S. Central LLC, an entity owned by James H.

McClelland and created in 2011; and Mack Property Group Ltd., an entity created in 2009.

10. In 2013, however, the McClelland family began to create new entities owned directly or indirectly by the McClelland family.

11. The McClelland family entities included Mack Industries VI LLC, Mack Investments I LLC, Mack Investments II LLC, Nola North LLC, 2300-16 S. Central LLC, and others.

12. The Debtor and the McClelland family entities engaged in the business of wholesale real estate investing, management, and development.

2. TTS's relationship to the McClelland family entities.

13. TTS is a Chicagoland stone vendor.

14. TTS fabricated and installed granite and related products in real estate owned by the Debtor, by the McClelland family entities, and by others.

15. As described in detail in this complaint, the Debtor paid TTS to work on real estate that the Debtor did not own as part of a scheme to dissipate its assets to hinder, delay, and defraud American Residential Leasing Company LLC and to benefit the McClellands and their other entities.

3. The relationship between the Debtor and American Residential.

16. One line of business that the Debtor pursued was managing properties owned by American Residential Leasing Company LLC.

17. In December 2012, the Debtor entered into a Master Lease Agreement with American Residential.

18. Under the Agreement, the Debtor leased several hundred residential properties from American Residential.

19. Between December 2012 and January 2014, the Debtor and American Residential amended their Agreement 20 times to add additional properties.

20. Under the Agreement, the Debtor was to sublease the American Residential properties to residential tenants, and the Debtor was obligated to

maintain the properties, to pay American Residential certain rental and other fees each month, and to pay all property taxes levied against the properties.

21. Under the Agreement, the Debtor was obligated to pay American Residential monthly rents calculated from an annual base rent (the “Base Monthly Rental”) and quarterly rents based on a percentage of the Debtor’s annual gross revenues (the “Quarterly Percentage Rental”).

22. In January 2014, the Base Monthly Rental was \$405,878.13.

23. The Base Monthly Rental increased by up to 3% annually, so it increased to \$418,054.49 in February 2014, \$430,596.11 in January 2015, and \$444,514.00 in January 2016.

24. The Quarterly Percentage Rental amounts were estimated quarterly based on written statements (the “Quarterly Statements”) that the Debtor was supposed to provide to American Residential, setting forth the Debtor’s revenues for the previous quarter.

25. At the end of each year, the Debtor was also required to provide a written statement setting forth its actual gross revenue for the prior year and to pay any deficiency in the Quarterly Percentage Rental amounts actually paid during the prior year.

4. The Debtor threatens to dissipate assets if American Residential does not renegotiate the parties’ contract.

26. Beginning in summer 2014, the Debtor claimed that it was incapable of meeting its obligations under the Agreement and requested that the Agreement be modified to reduce those obligations. One of the Debtor’s primary negotiators was Eric Workman, the Debtor’s Vice President of Sales and Marketing.

27. On July 8, 2014, Workman sent an email to Christopher J. Byce (formerly Senior Vice President, Investments, of American Residential’s prior parent company) stating that “the overall economics of the Mack–ARP relationship ... is not performing at a profitability level that is sustainable to Mack.”

28. Later, on December 5, 2014, James H. McClelland, a Debtor representative and the son of the Debtor's owner, submitted a proposal to modify the Agreement via letter to Byce representing that "any substantial changes in the [proposed] terms will be untenable insofar as Mack's ability to perform under a revised agreement. Mack has exhausted all avenues to borrow the money to pay the back taxes, as the time frame and usage of funds makes this type of loan next to impossible for it to acquire."

29. In connection with the Debtor's request to modify the Agreement, its representatives made several statements revealing the Debtor's intent to engage in fraudulent conduct if American Residential did not agree to the Debtor's proposed terms.

30. Specifically, in June 2014, Workman told Byce that, absent a modification, the Debtor would transfer its assets to related entities for nothing in return to hinder American Residential's ability to exercise its legal remedies as a creditor or otherwise.

31. During the negotiations with American Residential, Workman also told Byce that the Debtor's special relationships with local authorities in Cook County and surrounding areas would prevent American Residential from exercising management and control over its properties.

32. American Residential and the Debtor were not able to agree on a modification to the Agreement.

33. The relationship between American Residential and the Debtor continued to deteriorate during the negotiations and after the negotiations failed.

34. By September 2014, the Debtor stopped making the full Base Monthly Rental Payments, and it made no payments at all in eight months between September 2014 and February 2016. American Residential calculates that the Debtor owes more than \$4.7 million for unpaid rent.

35. In 2014, the Debtor stopped paying property taxes on American Residential's properties for the years 2013 and forward. American Residential calculates that the Debtor owes more than \$6.5 million for these taxes.

36. American Residential sent the Debtor a Notice of Default on December 2, 2014.

37. Eventually, on March 21, 2016, American Residential filed a complaint against the Debtor and others in Illinois state court.

5. The parties do not agree on a modification to the Agreement, so the Debtor dissipates its assets.

38. American Residential and the Debtor were not able to agree on a modification to the Agreement.

39. Even before making its threats to American Residential, the Debtor began preparing for a possible breakdown in the business relationship.

40. In the months leading up to and during the negotiations with American Residential, the Debtor had already begun dissipating its assets. True to its threat to American Residential, the Debtor continued that dissipation when the negotiations failed.

41. Prior to 2013, the McClellands ran almost the entire real estate business in the Debtor's name.

42. In 2013, however, the McClelland family began to create new entities and to divert business opportunities and assets from the Debtor to those entities.

43. In 2013, the McClellands created at least 15 new entities. In 2014, they created at least four; in 2015, at least six; and in 2016, at least two.

44. The Debtor owned five of these new entities: Mack Industries II LLC, Mack Industries III LLC, Mack Industries IV LLC, Mack Industries V LLC, and Mack Industries VI LLC.

45. The remaining new entities were owned by James K. McClelland, James H. McClelland, or both.

46. The McClellands used these new entities to pursue business opportunities that the Debtor would have pursued in the past.

47. Although the Debtor still owned some real estate after 2013, the vast majority of real estate acquired for flipping was acquired by the new entities. In addition, the Debtor transferred real estate from itself to these new entities.

48. By acquiring real estate and other assets in the name of the new entities and transferring real estate from the Debtor to the new entities, the McClelland family reduced the assets that the Debtor had that could be collected by American Residential.

49. Compounding the situation, the Debtor drew down on its own assets to benefit these other entities.

50. The Debtor paid contractors to work on and improve the real estate owned by the other entities. It bought supplies that would be used only to improve real estate owned by the other entities. It paid bank loans incurred by the other entities. It paid for other services, such as lawyers or tax advisors, to benefit the other entities.

51. The Debtor did not get any value for making these payments. Instead, the parties that benefitted were the other entities and, ultimately, the McClellands.

52. From 2013 to 2017—the period in which the Debtor claimed that it could not pay American Residential what it owed under the Agreement—the McClelland family extracted at least \$10.7 million in cash from the Debtor and the other entities.

53. By spending its own money and getting nothing in return, the Debtor further dissipated its assets, further hindering, delaying, and defrauding American Residential while the McClellands benefitted.

54. The Debtor also concealed its dissipation from American Residential.

55. The Debtor was supposed to provide American Residential with Quarterly Statements detailing its income, but the Debtor stopped providing those reports after June 2014.

56. In 2016, after the Debtor defaulted on the Agreement, American Residential tried to take over management of its properties.

57. The Debtor, however, prevented American Residential from doing so by refusing to provide subtenant and property information that American Residential requested and was entitled to under the Agreement.

58. The Debtor's efforts to dissipate its assets to hinder, delay, and defraud American Residential continued from 2013 to March 2017, when the Debtor filed for bankruptcy.

59. The Debtor's efforts to render itself insolvent were successful.

60. The Debtor's books and records reflect that, on March 24, 2017, the date it filed for bankruptcy, the Debtor had assets of \$56.4 million and liabilities of \$71.2 million on a cash basis.

61. The Debtor's books and records reflect that, in the year prior to March 24, 2017, the Debtor had net income of negative \$7,270,679.43 on a cash basis.

62. Creditors existed with standing to bring an action against the Debtor to avoid the obligations and transfers described in this complaint under applicable non-bankruptcy law, including American Residential and the Internal Revenue Service. To the extent the IRS is a creditor, the period for avoiding obligations and transfers is at least 10 years.

63. During the course of this proceeding, the Trustee may learn (through discovery or otherwise) of additional obligations or transfers made to or for the benefit of TTS during the period for which obligations or transfers can be avoided. It is the Trustee's intention to avoid and recover all obligations and transfers the Debtor made that are avoidable under 11 U.S.C. §§ 544 and 548. The Trustee reserves his right to amend his complaint to include: (i) further information regarding the obligations and transfers; (ii) additional obligations and transfers; (iii) modifications of and/or revisions to any defendant's name; (iv) additional defendants; and/or (v) additional causes of action or legal theories, if applicable, (collectively, the "Amendments") that may become known to the Trustee at any time during this adversary proceeding, through formal discovery or otherwise, and for the Amendments to relate back to the date of the original complaint.

COUNT 1 – AVOIDANCE AND RECOVERY OF CONSTRUCTIVE FRAUDULENT TRANSFERS

**740 ILCS 160/5(a)(2), 6(a), and 8(a),
and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(B), and 550(a)**

64. The Trustee incorporates the previous allegations of this complaint as though fully set forth in this count.

65. The Trustee pleads this count in the alternative to the extent the relief or the allegations contradict anything else contained in this complaint.

1. The Debtor pays TTS to work on real estate owned by other entities.

66. Between September 13, 2013, and March 27, 2015, the Debtor made transfers to TTS totaling \$317,700.65 for granite and related products for real estate that the Debtor did not own.

67. A list of each transfer that the Debtor made to TTS during the time period at issue in this complaint is attached as Exhibit A.

68. The Debtor made the transfers on Exhibit A by check from its account no. 6212 at First Community Financial Bank.

69. Exhibit A also identifies the invoices paid by each transfer, along with the owner of the property for each invoice and the owner of the property at the time of the invoice.

70. Two of the owners on Exhibit A are land trusts owned by McClelland family entities.

71. The beneficial owner of Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345 is Mack Industries II LLC.

72. The beneficial owner of Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677 is Mack Industries III LLC.

73. As detailed on Exhibit A, the Debtor transferred a total of \$391,706.65 to TTS during the time period at issue in this complaint. Of this total, \$74,006.00 was for properties owned by the Debtor or American Residential. The remaining \$317,700.65 was for properties that the Debtor did not own.

2. The Debtor did not receive reasonably equivalent value in exchange for paying TTS.

74. The invoices and transfers at issue in this complaint were for parcels of real estate that the Debtor did not own.

75. Instead, the real estate on which TTS worked was owned by the McClelland family, Mack Investments I LLC, Mack Investments II LLC, Wheelhouse Investments LLC, Mack Industries II LLC, Mack Industries III LLC, Mack Industries V LLC, and others.

76. Because the Debtor did not own the real estate on which TTS worked, the Debtor did not benefit at all from TTS's services.

77. The Debtor did not benefit from paying TTS's invoices.

78. By paying TTS's invoices, the Debtor transferred away assets and got no benefit in return.

79. Therefore, the Debtor did not receive a reasonably equivalent value for the transfers detailed in this complaint.

3. The Debtor was insolvent at the time it made the transfers to TTS.

80. The transfers at issue in this complaint occurred September 13, 2013, and March 27, 2015.

81. The Debtor's books and records reflect that, on July 31, 2014, Mack's liabilities exceeded its assets by \$2,016,009.01.

82. The Debtor's liabilities exceeded its assets on each date after July 31, 2014, until it filed for bankruptcy on March 24, 2017.

83. The Debtor's books and records reflect that, on March 24, 2017, the Debtor's liabilities exceeded its assets by \$14,794,001.84.

84. The Debtor's books and records reflect that, each month between January 17, 2013, and July 31, 2014, the Debtor's assets exceeded its liabilities by an average of just \$1,118,914.71. During that period, the Debtor's assets each month averaged just \$29,508,792.88, while its liabilities each month averaged \$28,319,878.16.

85. The Debtor's earnings decreased significantly between September 2013 and July 2014, further demonstrating its fragile financial position. The Debtor's net income between September 13, 2013, and July 31, 2014, was negative \$5,731,000.05.

86. Because the Debtor was losing money so rapidly, it was not generating sufficient profits to sustain its operations, particularly because its equity was only about 4% of the value of its assets.

87. In fact, because the Debtor was losing money, by July 31, 2014, the Debtor was balance sheet insolvent and remained so until it filed for bankruptcy.

88. During the time period at issue in this count—that is, between September 13, 2013, and March 27, 2015—the Debtor's net income was negative \$9,626,919.74.

89. During the time period at issue in this count, the Debtor was incurring debts and was not paying those debts as they became due.

90. The Debtor's accounts payable had the following ages on these dates:

Date	Current	1-30 days	31-60 days	61-90 days	>90	Total
3/27/15	\$20,133.59	\$324,848.24	\$5,058.50	\$5,686.87	\$148,984.33	\$504,711.53
3/27/14	4,005.01	610,202.62	140,162.05	93,044.28	38,136.67	885,550.64
9/13/13	16,707.31	881,349.70	90,425.34	3,843.23	39,298.30	1,031,623.88

Wherefore, the Trustee requests that this Court enter judgment in his favor and against TTS (a) avoiding the transfers, (b) entering a money judgment against TTS in the amount of \$317,700.65 or such higher amount as may be established at trial, plus interest from the date of each transfer at the maximum legal rate, costs, and expenses of this action including, without limitation, attorneys' fees, and (c) granting any additional relief that is appropriate under the circumstances.

COUNT 2 – AVOIDANCE AND RECOVERY OF ACTUAL FRAUDULENT TRANSFERS

**740 ILCS 160/5(a)(1) and 8(a)
and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(A), and 550(a)**

91. The Trustee incorporates the previous allegations of this complaint as though fully set forth in this count.

92. The Trustee pleads this count in the alternative to the extent the relief or the allegations contradict anything else contained in this complaint.

93. As described above, the Debtor engaged in a scheme to hinder, delay, and defraud American Residential by transferring away its assets, reducing what American Residential could collect and improving the position of the McClellands and their other entities.

94. As part of its scheme to hinder, delay, and defraud American Residential, the Debtor paid TTS \$317,700.65 for work on real estate owned by the McClelland family, Mack Investments I LLC, Mack Investments II LLC, Wheelhouse Investments LLC, Mack Industries II LLC, Mack Industries III LLC, Mack Industries V LLC, and others as described in detail above.

95. Each transfer to TTS reduced the Debtor's assets, leaving less for American Residential to collect.

96. Each transfer to TTS was for real estate owned by other entities, benefitting the McClelland family at the expense of American Residential.

97. The Debtor did not disclose the transactions with TTS to American Residential. The Debtor stopped providing the required disclosures to American Residential in June 2014.

98. The Debtor made the transfers between September 2013 and March 2015. American Residential issued a notice of default in December 2014.

99. As described in detail above, the Debtor did not get any value for making the payments to TTS because it did not own the real estate on which TTS worked.

100. As described in detail above, the Debtor was insolvent at the time it made the transfers to TTS.

Wherefore, the Trustee requests that this Court enter judgment in his favor and against TTS (a) avoiding the transfers, (b) entering a money judgment against TTS in the amount of \$317,700.65 or such higher amount as may be established at trial, plus interest from the date of each transfer at the maximum legal rate, costs, and expenses of this action including, without limitation, attorneys' fees, and (c) granting any additional relief that is appropriate under the circumstances.

Dated: April 6, 2020

Respectfully submitted,

Ronald R. Peterson, as chapter 7
trustee for Mack Industries Ltd.

By: /s/ Jeffrey K. Paulsen
One of His Attorneys

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EXHIBIT A

Ex. A - Transfers and Invoices

Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
9/13/2013	64254	\$900.00						
			813934	8/23/2013	\$900.00	17904 Rose, Lansing	29-36-200-151-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
9/27/2013	64613	\$6,388.40						
			813919	8/20/2013	\$2,862.40	9111 Central, Oak Lawn	24-04-300-005-0000	Mack Investments I LLC
			813951	8/31/2013	\$3,526.00	1014 Eagle Point, Matteson	31-20-116-002-0000	Mack Investments I LLC
10/25/2013	65185	\$4,138.00						
			913986	9/16/2013	\$3,058.00	2836 W 99th St, EP	24-12-125-025-0000	Mack Investments I LLC
			9131014	9/25/2013	\$1,080.00	3711 215th St, Matteson	31-26-104-007-0000	American Residential Leasing Co. LLC
11/8/2013	65515	\$28,847.25						
			813941	8/30/2013	\$24,836.25	111 Ruffled Feathers, Lemont	22-34-212-013-0000	James and Jennifer McClelland
			10131100	10/17/2013	\$990.00	18711 Lee St, CCH	31-03-305-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			10131099	10/17/2013	\$726.00	17535 William St, Lansing	30-29-311-042-0000	American Residential Leasing Co. LLC
			10131098	10/17/2013	\$720.00	14621 Avers Ave, Midlothian	28-11-126-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			10131097	10/17/2013	\$1,575.00	841 Princeton Ave, Matteson	31-20-204-008-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
11/22/2013	65854	\$1,674.00						
			10131101	10/18/2013	\$795.00	3924 W 143rd, Crestwood	28-02-319-033-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			10131123	10/25/2013	\$879.00	19 N Elm, Glenwood	32-03-421-016-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
12/6/2013	66202	\$2,514.00						
			10131145	10/31/2013	\$1,098.00	17204 Bernadine St, Lansing	30-29-126-012-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			10131149	11/4/2013	\$1,416.00	1001 Purdue Lane, Matteson	31-21-106-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
12/20/2013	66491	\$15,615.00						
			10131124	10/25/2013	\$1,038.00	2748 181st St, Lansing	30-31-117-108-0000	American Residential Leasing Co. LLC
			10131143	10/31/2013	\$2,925.00	130 Maryview Pkwy, Matteson	31-16-103-016-0000	Mack Industries Ltd.
			11131163	11/7/2013	\$765.00	3529 212th Place, Matteson	31-23-404-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			11131164	11/7/2013	\$819.00	18107 Juneway Ct, CCH	28-34-407-046-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			11131165	11/7/2013	\$1,056.00	19809 Brook Ave., Lynwood	33-07-321-001-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			11131169	11/11/2013	\$690.00	126 E Clark, Glenwood	32-03-322-033-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			11131170	11/11/2013	\$990.00	2724 Lake Pk Dr, Lynwood	33-07-101-039-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			11131194	11/18/2013	\$900.00	19528 Sycamore, Mokena	19-09-10-316-010	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			11131193	11/18/2013	\$861.00	818 Princeton, Matteson	31-20-203-004-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			11131192	11/18/2013	\$1,080.00	3743 167th Place, CCH	28-26-105-036-0000	Mack Investments I LLC
			11131200	11/19/2013	\$600.00	29 N Oak, Glenwood	32-03-329-014-0000	American Residential Leasing Co. LLC
			11131201	11/19/2013	\$831.00	226 E Maple, Glenwood	32-03-419-029-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			11131217	11/25/2013	\$960.00	18812 Cypress Ave, CCH	31-03-417-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			11131218	11/25/2013	\$1,170.00	731 Old Farm, Matteson	31-17-323-020-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			11131220	11/27/2013	\$930.00	17810 Princeton, CCH	28-35-118-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
1/3/2014	66769	\$11,327.00						
			12131234	12/3/2013	\$840.00	16940 Old Elm Drive, CCH	28-26-110-050-0000	American Residential Leasing Co. LLC
			12131243	12/5/2013	\$3,647.00	3037 Matthew Ln, Homewood	31-01-116-008-0000	Mack Industries Ltd.
			12131241	12/5/2013	\$900.00	5532 LaPalm Dr, Oak Forest	28-09-304-009-0000	Mack Industries Ltd.
			12131251	12/9/2013	\$900.00	19010 Cedar Ave, CCH	31-03-403-005-0000	Mack Industries Ltd.
			12131250	12/9/2013	\$1,110.00	2932 188th Place, Lansing	33-06-208-007-0000	Mack Industries Ltd.
			12131258	12/10/2013	\$1,050.00	17861 Princeton Ln, CCH	28-35-119-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12131260	12/11/2013	\$870.00	17871 Anthony Ave, CCH	28-34-106-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			12131259	12/11/2013	\$1,110.00	18240 Grant St, Lansing	30-32-303-020-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12131261	12/11/2013	\$900.00	18649 Chestnut, CCH	31-03-207-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
1/17/2014	67052	\$1,390.00						
			12131272	12/16/2013	\$800.00	18310 Oakwood, Lansing	30-31-409-004-0000	Mack Industries Ltd.
			12131271	12/16/2013	\$590.00	3661 178th St, Lansing	30-32-200-078-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
1/31/2014	67350	\$8,610.00						
			11131168	11/11/2013	\$1,614.00	21301 Jeffrey Dr, Matteson	31-23-321-001-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677

Ex. A - Transfers and Invoices

Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
			12131296	12/19/2013	\$780.00	17209 Hawthorne, East Hazel Cr	29-30-408-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			12131297	12/19/2013	\$840.00	18400 Chicago, Lansing	30-31-419-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12131295	12/19/2013	\$1,020.00	3664 Adams St, Lansing	30-32-202-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12131313	12/23/2013	\$1,320.00	13839 LeClaire Ave, Crestwood	28-04-207-008-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141005	1/6/2014	\$900.00	19920 Monterey Ave, Lynwood	33-07-320-016-0000	Robert Petak
			01141007	1/8/2014	\$1,056.00	130 Maryview Pkwy, Matteson	31-16-103-016-0000	Mack Industries Ltd.
			01141009	1/9/2014	\$1,080.00	4055 149th St, Midlothian	28-10-413-045-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
2/14/2014	67624	\$13,200.00						
			01141011	1/9/2014	\$990.00	955 E 161st St, SH	29-14-311-032-0000	Mack Investments I LLC
			01141014	1/13/2014	\$1,290.00	17710 Arlington Dr, CCH	28-35-107-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141013	1/13/2014	\$960.00	17930 Rose Ave., Lansing	29-36-200-122-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141010	1/14/2014	\$1,050.00	18045 Edwards, CCH	28-34-410-009-0000	Mack Industries Ltd.
			01141017	1/14/2014	\$1,290.00	602 E 158th St, So Holland	29-15-203-026-0000	Mack Investments I LLC
			01141037	1/20/2014	\$1,140.00	17479 Eastgate Dr, CCH	28-27-403-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141039	1/20/2014	\$1,170.00	3118 W 183rd St, Homewood	28-36-304-043-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141040	1/20/2014	\$1,560.00	18761 John Ave, CCH	31-03-307-009-0000	Mack Investments I LLC
			01141036	1/20/2014	\$1,170.00	18826 Queens Rd, Homewood	32-05-405-011-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141035	1/20/2014	\$1,350.00	4625 W 189th St, CCH	31-03-312-016-0000	Mack Industries Ltd.
			01141038	1/20/2014	\$1,230.00	17112 Elm St, HC	28-26-404-026-0000	Mack Investments I LLC
2/28/2014	67955	\$12,990.00						
			01141049	1/23/2014	\$1,080.00	4932 Lakeshore, Richton Pk	31-33-407-043-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141064	1/27/2014	\$870.00	14725 Memorial Dr, Dolton	29-10-236-025-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141066	1/27/2014	\$1,020.00	14535 Kedvale, Midlothian	28-10-220-008-0000	Mack Investments I LLC
			01141065	1/27/2014	\$990.00	17006 Central Park Ave, HC	28-26-123-005-0000	American Residential Leasing Co. LLC
			01141071	1/28/2014	\$1,050.00	616 Sullivan, Univer Pk	21-14-13-204-034-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141072	1/28/2014	\$1,230.00	17241 S Langley, SH	29-27-212-025-0000	Mack Investments I LLC
			01141073	1/28/2014	\$1,140.00	623 E 162nd Place, SH	29-22-202-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141077	1/29/2014	\$810.00	349 E Maple Dr, Glenwood	32-03-412-021-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01141079	1/29/2014	\$930.00	17770 Springfield Ave, CCH	28-35-103-080-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141078	1/29/2014	\$870.00	737 E 160th St, So Holland	29-15-407-066-0000	Mack Investments I LLC
			01141081	1/30/2014	\$1,110.00	4124 Indian Hill, CCH	28-27-408-003-0000	Christopher Meredith
			01141082	1/30/2014	\$960.00	17825 Oakley, Lansing	30-31-121-031-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			01141080	1/30/2014	\$930.00	18900 Oakwood, CCH	31-03-410-043-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
3/14/2014	68219	\$15,975.00						
			02141098	2/5/2014	\$855.00	3846 W 217th St, Matteson	31-26-110-064-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02141097	2/5/2014	\$885.00	3801 216th Place, Matteson	31-26-110-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02141099	2/5/2014	\$1,230.00	3423 Adams St, Lansing	30-32-111-039-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			02141100	2/5/2014	\$1,050.00	1205 Evergreen Rd, Homewood	32-05-120-002-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			02141102	2/7/2014	\$990.00	18024 Greenview Ter, CCH	28-34-410-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			02141103	2/10/2014	\$1,290.00	18921 Willow Ave., CCH	31-03-405-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02141104	2/10/2014	\$990.00	9736 Nashville, Oak Lawn	24-07-211-055-0000	Mack Investments I LLC
			02141105	2/10/2014	\$885.00	16452 George Dr, Oak Forest	28-22-303-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02141106	2/11/2014	\$1,350.00	17658 Lincoln Ave, Homewd	28-36-205-020-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02141107	2/11/2014	\$930.00	1387 Superior Ave, Cal City	30-19-216-010-0000	Mack Industries Ltd.
			02141108	2/12/2014	\$1,680.00	645 Saginaw, Cal City	30-07-325-003-0000	Mack Investments I LLC
			02141147	2/24/2014	\$1,080.00	659 Paxton Ave, Cal City	29-12-424-037-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			02141148	2/24/2014	\$1,920.00	1020 E 153rd St, So Holland	29-11-323-020-0000	Mack Industries Ltd.
			02141153	2/26/2014	\$840.00	9535 Utica, Evergreen Pk	24-12-103-006-0000	Mack Investments I LLC
3/28/2014	68503	\$7,263.00						
			02141171	2/28/2014	\$1,840.00	15225 Willow Creek	27-18-204-003-0000	James K. McClelland and Ann McClelland
			03141181	3/4/2014	\$1,943.00	9124 S Utica, Evergreen Pk	24-01-302-024-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345

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Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
			03141187	3/7/2014	\$1,740.00	10975 S Church St, Chicago	25-18-415-013-0000	Mack Investments I LLC
			03141195	3/10/2014	\$1,740.00	8610 S Laverne, Burbank	19-33-405-023-0000	Mack Investments I LLC
4/11/2014	68776	\$2,430.00						
			03141197	3/11/2014	\$1,125.00	3311 Charlemagne, HC	28-35-411-002-0000	American Residential Leasing Co. LLC
			03141223	3/20/2014	\$1,305.00	4461 W 186th St, CCH	31-03-109-018-0000	Mack Industries Ltd.
4/25/2014	69095	\$7,852.00						
			03141266	3/31/2014	\$1,035.00	548 Landau Rd, University Pk	21-14-13-207-012	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			03141265	3/31/2014	\$1,455.00	624 Hickok Dr, Univ Pk	21-14-13-101-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			04141272	4/2/2014	\$1,035.00	9624 Troy Ave, Evergreen Park	24-12-110-010-0000	Mack Industries Ltd.
			04141284	4/5/2014	\$4,327.00	2640 1st Private Rd, Flossmoor	31-12-401-004-0000	Mack Industries Ltd.
5/9/2014	69351	\$7,545.00						
			04141300	4/10/2014	\$1,050.00	520 169th St, SH	29-22-410-018-0000	Mack Investments I LLC
			04141299	4/10/2014	\$1,230.00	705 E 163rd St, So Holland	29-22-204-001-0000	Springview Investments II IL II LLC
			04141304	4/10/2014	\$3,375.00	13724 Cedarbend, Homer	16-05-10-208-009-0000	Mack Industries Ltd.
			04141340	4/22/2014	\$930.00	17122 Central Pk Ave, HC	28-26-301-004-0000	Mack Industries Ltd.
			04141347	4/22/2014	\$960.00	17148 Evans Ave, So Holland	29-26-105-004-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
5/23/2014	69680	\$6,060.00						
			12131314	1/1/2014	\$930.00	16830 S Glen Oak Dr, CCH	28-26-107-047-0000	Mack Investments I LLC
			02141121	2/14/2014	\$960.00	3322 Woodworth, HC	28-26-408-037-0000	Mack Investments I LLC
			02141133	2/19/2014	\$900.00	18130 Oakwood, Lansing	30-31-221-035-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			04141353	4/23/2014	\$1,110.00	22345 Ridgeway, Richton Pk	31-35-102-017-0000	Mack Investments I LLC
			04141352	4/23/2014	\$930.00	13054 Honore, Blue Island	25-31-216-036-0000	Mack Investments I LLC
			04141387	4/30/2014	\$1,230.00	738 E 169th St, So Holland	29-22-414-016-0000	Burmeister Jon
6/6/2014	70001	\$15,737.00						
			05141399	5/6/2014	\$2,537.00	2231 S 61st Ave, Cicero	16-29-106-017-0000	Mack Industries Ltd.
			05141411	5/8/2014	\$10,000.00	6820 Centennial Dr., Tinley	28-19-100-051-0000	Mack Investments II LLC, Series 6800 Centennial LLC
			05141478	5/22/2014	\$3,200.00	15400 Lisa Ct, Orland Pk	27-14-109-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
7/18/2014	70954	\$8,880.00						
			05141482	5/23/2014	\$1,080.00	11319 S Sawyer, Chg	24-23-212-016-0000	Mack Industries Ltd.
			05141497	5/23/2014	\$1,170.00	15114 Oak, Dalton	29-10-409-016-0000	Mack Investments I LLC
			05141483	5/23/2014	\$1,020.00	519 S Paxton Ave, Cal City	29-12-400-047-0000	Mack Industries II LLC
			05141480	5/27/2014	\$1,620.00	16448 Wausau, SH	29-22-107-023-0000	Mack Industries II LLC
			05141477	5/27/2014	\$1,590.00	1039 Brampton, UP	21-14-13-407-009	Mack Industries Ltd.
			05141501	5/28/2014	\$990.00	1333 Buffalo Ave, Cal City	30-19-215-009-0000	Mack Investments I LLC
			05141502	5/28/2014	\$1,410.00	428 Buffalo Ave, Cal City	30-07-214-035-0000	Mack Investments I LLC
8/1/2014	71283	\$10,931.00						
			06141595	6/20/2014	\$1,530.00	649 Price, Cal City	30-08-325-004-0000	Mack Investments I LLC
			06141606	6/23/2014	\$1,020.00	619 Greenbay, Cal City	30-07-423-021-0000	Mack Investments I LLC
			06141605	6/23/2014	\$510.00	9232 S 50th Ct, Oak Lawn	24-04-424-007-0000	Mack Investments I LLC
			06141607	6/23/2014	\$2,070.00	811 Greenbay Ave, Cal City	30-18-228-008-0000	Mack Industries II LLC
			06141610	6/23/2014	\$2,741.00	108 N Princeton Ave, Villa Park	06-04-414-029	Mack Industries Ltd.
			06141651	6/27/2014	\$990.00	448 Hirsch, Cal City	30-08-108-051-0000	Mack Industries Ltd.
			06141652	6/30/2014	\$810.00	537 Nathan Rd, UP	21-14-13-218-004	Mack Industries Ltd.
			06141653	6/30/2014	\$1,260.00	4936 153rd St, Oak Forest	28-16-213-033-0000	Mack Industries Ltd.
8/15/2014	71586	\$4,589.00						
			07141684	7/11/2014	\$1,564.00	Otto Tomes		Otto Tomes
			07141736	7/25/2014	\$325.00	108 N Princeton Ave, Villa Park	06-04-414-029	Mack Industries Ltd.
			07141737	7/25/2014	\$780.00	1039 Abbott Ln, UP	21-14-13-405-008	Mack Industries Ltd.
			07141742	7/25/2014	\$720.00	2612 W 89th Pl, Evrg Prk	24-01-208-027-0000	Mack Industries II LLC
			07141740	7/28/2014	\$1,200.00	16342 Evans, SH	29-22-203-005-0000	Mack Investments I LLC
8/29/2014	71913	\$9,060.00						

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Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
			05141442	7/1/2014	\$1,020.00	4924 Imperial Dr, Richton Pk	31-33-205-003-0000	Gecko Mack-4924 Imperial, Richton Park
			05141440	7/1/2014	\$1,620.00	1834 Terrace Rd, Homewood	32-06-400-052-0000	SFR-CHI I
			05141439	7/1/2014	\$1,380.00	231 Oakhurst, Matteson	31-17-209-041-0000	Mack Industries Ltd.
			07141682	7/1/2014	\$1,350.00	16061 Prairie, SH	29-15-310-012-0000	Mack Industries II LLC
			07141688	7/1/2014	\$900.00	2717 Turtle Creek, HC	28-36-222-003-0000	Mack Investments I LLC
			07141687	7/1/2014	\$930.00	15637 Orchid Dr, So Holland	29-15-213-002-0000	Mack Industries Ltd.
			06141574	7/1/2014	\$1,080.00	3400 Seine Ct, HC	28-35-408-043-0000	Mack Industries Ltd.
			07141737	7/25/2014	\$780.00	1039 Abbott Ln, UP	21-14-13-405-008	Mack Industries Ltd.
9/12/2014	72237	\$16,962.50						
			07141772	7/31/2014	\$2,775.00	3633 Austin Blvd, Cicero	16-32-408-014-0000	Mack Investments I LLC
			08141774	8/5/2014	\$275.00	6800 Centennial Dr, Tinley	28-19-100-051-0000	Mack Investments II LLC, Series 6800 Centennial LLC
			08141781	8/8/2014	\$810.00	1325 E.168th Place, SH	29-23-404-010-0000	Mack Industries II LLC
			08141780	8/8/2014	\$1,080.00	22457 Arquilla Dr, Rich Pk	31-33-105-014-0000	Mack Investments I LLC
			08141792	8/13/2014	\$800.00	18823 Ashland, Homewood	32-05-310-004-0000	Mack Industries II LLC
			08141793	8/13/2014	\$2,854.00	10235 S Charles, Chicago	25-08-307-028-0000	Mack Investments I LLC
			08141810	8/15/2014	\$3,827.50	1855 S Ridgeland, Berwyn	16-20-316-001-0000	Mack Industries Ltd.
			08141816	8/18/2014	\$1,380.00	1566 Vincennes, Crete	23-15-17-203-008-0000	Mack Industries II LLC
			08141826	8/19/2014	\$3,161.00	4823 LaCrosse Ave, Chgo	19-09-215-007-0000	Mack Industries Ltd.
9/26/2014	72548	\$7,620.00						
			08141853	8/8/2014	\$1,920.00	917 Cordoba Ct, Univ Pk	21-14-13-107-003-0000	Mack Industries II LLC
			08141843	8/22/2014	\$1,080.00	17927 Lorenz Ave, Lansing	30-31-213-006-0000	Mack Industries II LLC
			08141837	8/22/2014	\$810.00	3858 Holly Court, CCH	28-26-307-015-0000	Mack Industries II LLC
			08141854	8/26/2014	\$780.00	147 E Maple Dr, Glenwood	32-03-330-010-0000	Mack Industries II LLC
			08141855	8/26/2014	\$1,260.00	112 E 160th Place, SH	29-15-302-022-0000	Mack Investments I LLC
			08141870	8/27/2014	\$810.00	17152 Cornell Ave, SH	29-26-206-020-0000	Mack Industries II LLC
			08141869	8/28/2014	\$960.00	18537 Ashland Ave Homewood	32-05-110-024-0000	Mack Investments I LLC
10/10/2014	72923	\$9,670.50						
			09141889	9/3/2014	\$1,230.00	6023 Aspen, Matteson	31-17-313-007-0000	Mack Industries II LLC
			09141886	9/3/2014	\$4,270.50	995 Summerhill Dr, Aurora	14-25-428-007	Mack Industries II LLC
			09141918	9/15/2014	\$1,560.00	3260 203rd St, Lynwood	33-17-103-011-0000	Mack Industries II LLC
			09141916	9/15/2014	\$690.00	17541 Greenbay, Lansing	30-30-411-051-0000	Mack Industries II LLC
			09141917	9/15/2014	\$960.00	17303 Roy St, Lansing	30-29-112-041-0000	Mack Industries II LLC
			09141919	9/22/2014	\$960.00	3740 Highland, CCH	28-35-105-018-0000	Mack Investments I LLC
10/24/2014	73277	\$11,305.00						
			07141686	7/11/2014	\$900.00	3860 178th Pl, CCH	28-35-115-005-0000	Mack Investments I LLC
			07141699	7/18/2014	\$2,875.00	1519 Bates Ct,Schaumburg	07-29-413-013-0000	Mack Industries Ltd.
			07141771	7/31/2014	\$900.00	17810 Sarah Lane, CCH	28-35-117-019-0000	Mack Investments I LLC
			08141794	8/13/2014	\$840.00	5425 LaPlam Dr, Oak Forest	28-09-311-010-0000	Mack Industries II LLC
			08141824	8/19/2014	\$750.00	17213 Springtide Ln, HC	28-26-310-017-0000	Mack Industries II LLC
			08141830	8/20/2014	\$1,410.00	15548 LeClaire, Oak Frst	28-16-400-021-0000	Mack Industries Ltd.
			08141833	8/20/2014	\$1,200.00	17925 Walter St, Lansing	30-32-108-037-0000	Mack Industries II LLC
			09141957	9/30/2014	\$1,320.00	17701 Devon, CCH	28-35-107-031-0000	Mack Industries II LLC
			10141960	10/1/2014	\$1,110.00	18841 Cedar St, CCH	31-03-412-031-0000	Mack Industries Ltd.
11/7/2014	73600	\$19,105.50						
			09141931	9/18/2014	\$1,140.00	3732 153rd St, Midlo	28-14-105-003-0000	Mack Industries II LLC
			09141932	9/23/2014	\$3,075.00	3245 Cuyler, Berwyn	16-32-112-055-0000	Mack Industries Ltd.
			09141934	9/23/2014	\$960.00	3740 176th St, CCH	28-35-103-030-0000	Mack Industries II LLC
			10141965	10/2/2014	\$1,290.00	17720 Central Pk, CCH	28-35-113-011-0000	Mack Industries II LLC
			09141958	10/2/2014	\$7,521.50	1728 Patricia Ln, Flossmo	31-12-310-007-0000	Mack Industries II LLC
			10141985	10/9/2014	\$3,469.00	4325 W 83rd St, Chicago	19-34-401-040-0000	Mack Investments I LLC
			10142001	10/10/2014	\$1,650.00	15820 Park Ave, SH (Chicago Rd)	29-15-108-027-0000	Mack Industries Ltd.

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11/21/2014	73929	\$14,310.00						
			09141936	9/23/2014	\$960.00	844 Terrace Dr, Glenwood	32-04-104-009-0000	Mack Industries V LLC
			09141935	9/23/2014	\$1,290.00	4748 176th St, CCH	28-34-107-036-0000	Mack Industries V LLC
			09141933	9/23/2014	\$990.00	107 Pine Ln, Glenwood	32-03-420-020-0000	Mack Industries II LLC
			10142004	10/13/2014	\$4,440.00	8453 S. Kenneth, Chicago	19-34-304-059-0000	Mack Investments I LLC
			10142000	10/14/2014	\$960.00	15426 S Park Ave, SH	29-15-105-012-0000	Mack Industries V LLC
			10141995	10/14/2014	\$840.00	15065 Maryland Ave, SH	29-11-301-044-0000	Mack Industries II LLC
			10141994	10/14/2014	\$1,140.00	3209 Woodworth Pl, HC	28-26-410-011-0000	Mack Industries II LLC
			10142011	10/15/2014	\$1,110.00	17784 Springfield, CCH	28-35-103-082-0000	Mack Industries II LLC
			10142009	10/15/2014	\$870.00	21 Sycamore Ln, Glenwood	32-03-416-004-0000	Mack Industries V LLC
			10141999	10/16/2014	\$900.00	17850 Vale Ln, CCH	28-35-206-016-0000	Mack Industries II LLC
			10142024	10/21/2014	\$810.00	1225 Cleveland St, Lockprt	11-04-24-312-013	Mack Investments I LLC
12/5/2014	74351	\$10,872.00						
			09141904	9/12/2014	\$742.00	Mack Investments I LLC		Mack Investments I LLC
			1012037	10/23/2014	\$960.00	1121 Olive Rd, Homewood	29-32-404-058-0000	Mack Industries II LLC
			10142062	10/23/2014	\$1,260.00	5655 Crestwood, Matteson	31-17-212-037-0000	Mack Industries II LLC
			1012034	10/23/2014	\$960.00	1045 Samson Dr, Univ Pk	21-14-13-408-010	Mack Industries V LLC
			1012038	10/24/2014	\$1,100.00	16 N Elm, Glenwood	32-03-419-021-0000	Mack Industries II LLC
			1012044	10/24/2014	\$1,020.00	531 Hickok, Univ Park	21-14-13-217-016	Mack Industries II LLC
			1012042	10/24/2014	\$1,050.00	17912 Commercial, Lansing	30-31-109-033-0000	Mack Industries V LLC
			1012039	10/24/2014	\$960.00	4200 Arlington Dr., RP	31-27-409-001-0000	Mack Industries II LLC
			1012040	10/24/2014	\$930.00	820 Blackhawk Dr, Univ P	21-14-13-204-005	Mack Industries II LLC
			1012036	10/24/2014	\$990.00	2652 Woodworth, HC	28-25-405-021-0000	Mack Industries II LLC
			1012041	10/24/2014	\$900.00	746 E. 157th St., SH	29-15-218-016-0000	Mack Industries II LLC
12/19/2014	74944	\$12,990.00						
			1012050	10/27/2014	\$1,050.00	17011 Central Park, HC	28-26-123-016-0000	Mack Industries II LLC
			1012051	10/27/2014	\$1,440.00	5125 W. 101st St, Oak Lawn	24-09-411-005-0000	Mack Industries II LLC
			1012052	10/27/2014	\$1,230.00	15956 Debra Dr, Oak Forest	28-21-118-022-0000	Mack Industries II LLC
			11142088	11/5/2014	\$660.00	17948 Wentworth, Lansing	30-32-114-028-0000	Mack Industries II LLC
			11142087	11/5/2014	\$780.00	4508 Camden Ct, Rich Pk	31-27-312-012-0000	Mack Industries II LLC
			11142086	11/5/2014	\$900.00	17621 Grandview, HC	28-36-104-028-0000	Mack Industries Ltd.
			11142095	11/7/2014	\$1,050.00	4130 188th St, CCH	31-03-419-002-0000	Mack Industries II LLC
			11142094	11/7/2014	\$840.00	2657 171st St., HC	28-25-403-041-0000	Mack Industries II LLC
			11142111	11/11/2014	\$1,140.00	21123 Oak St, Matteson	31-23-401-005-0000	Mack Industries V LLC
			11142118	11/13/2014	\$1,290.00	3728 214th Pl, Matteson	31-23-307-012-0000	Mack Industries II LLC
			11142116	11/13/2014	\$690.00	17314 Henry, Lansing	30-29-113-052-0000	Mack Industries II LLC
			11142147	11/21/2014	\$990.00	15445 S. Cherry St., SH	29-15-207-010-0000	Mack Industries V LLC
			11142148	11/21/2014	\$930.00	3414 186th St., Lansing	30-32-327-031-0000	Mack Investments I LLC
1/2/2015	75077	\$15,329.00						
			12142180	12/1/2014	\$570.00	14506 Spaulding, Midlo	28-11-220-014-0000	Mack Industries Ltd.
			12142178	12/1/2014	\$1,260.00	19808 Lakewood Av, Lynwood	33-07-308-027-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142179	12/2/2014	\$750.00	231 Tulip Dr., Glenwood	32-03-419-004-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142185	12/3/2014	\$1,080.00	5152 Arquilla, RP	31-33-208-011-0000	Mack Industries Ltd.
			12142188	12/4/2014	\$2,986.00	1720 W 99th, Chicago	25-07-217-059-0000	Mack Investments I LLC
			12142199	12/5/2014	\$2,323.00	7644 W 66th St, BedfordPk	18-24-112-013-0000	Mack Industries II LLC
			12142207	12/10/2014	\$930.00	3722 W. 171st St., CCH	28-26-306-009-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142204	12/10/2014	\$1,020.00	1230 156th St, SH	29-14-212-026-0000	Mack Industries II LLC
			12142210	12/11/2014	\$1,560.00	1002 E. 153rd, SH	29-11-325-030-0000	Mack Investments I LLC
			12142211	12/11/2014	\$1,410.00	17936 Burnham, Lansing	30-31-213-022-0000	Wheelhouse Investments LLC
			12142205	12/14/2014	\$1,440.00	17300 Highland Ct., HC	28-25-407-014-0000	Wheelhouse Investments LLC
1/16/2015	75380	\$4,650.00						

Ex. A - Transfers and Invoices

Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
1/30/2015	75723	\$14,473.50	12142218	12/16/2014	\$1,800.00	1537 S 57th Ct, Cicero	16-20-229-019-0000	Mack Investments I LLC
			12142234	12/17/2014	\$930.00	4161 188th St., CCH	31-03-416-002-0000	Mack Industries II LLC
			12142235	12/17/2014	\$810.00	16719 Butterfield, CCH	28-26-106-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142229	12/17/2014	\$1,110.00	1223 Emerald, Chi Heights	32-21-109-009-0000	Mack Industries Ltd.
			12142260	12/23/2014	\$540.00	17508 Greenbay, Lansing	30-30-410-053-0000	Mack Industries II LLC
			12142261	12/23/2014	\$540.00	17525 Lorenz, Lansing	30-30-410-046-0000	Wheelhouse Investments LLC
			12142271	12/30/2014	\$2,173.50	2616 W97thPl, Evergreen Pk	24-12-216-053-0000	Mack Industries II LLC
			01151014	1/5/2015	\$960.00	657 E. 159th Ct, SH	29-15-412-028-0000	Mack Industries II LLC
			01151013	1/5/2015	\$2,155.50	3702 S 53rd, Cicero	16-33-319-026-0000	Mack Industries Ltd.
			01151012	1/5/2015	\$4,849.50	1322 S 58th Ave, Cicero	16-20-211-026-0000	Mack Industries II LLC
2/13/2015	76040	\$11,085.00	01151017	1/6/2015	\$3,255.00	151 Stanton Dr, Bartlett	06-32-304-019-0000	Mack Industries V LLC
			01151018	1/7/2015	\$840.00	15500 S. Park, SH	29-15-106-024-0000	Mack Industries V LLC
			01151028	1/12/2015	\$1,170.00	1212 King Dr, SH	29-14-213-006-0000	Mack Industries II LLC
			01151030	1/13/2015	\$1,170.00	3791 176th Place, Chicago	28-35-105-006-0000	Mack Industries II LLC
			01151029	1/13/2015	\$1,050.00	5143 Aldersyde Rd, Oak F	28-28-206-021-0000	Mack Industries II LLC
			01151035	1/13/2015	\$1,050.00	3468 N. Schultz, Lansing	30-32-315-020-0000	Mack Industries II LLC
			01151034	1/14/2015	\$690.00	344 Gehrig Circle, Bolingb	12-02-10-105-016-0000	Mack Industries V LLC
			01151040	1/15/2015	\$1,080.00	15640 Lamon, Oak Forest	28-16-406-024-0000	Mack Investments I LLC
			01151055	1/20/2015	\$1,050.00	16387 Terry Ln, Oak Forest	28-22-303-037-0000	Mack Industries II LLC
			01151062	1/22/2015	\$840.00	2742 W 97th Pl, Ever Pk	24-12-215-028-0000	Mack Industries II LLC
2/27/2015	76326	\$14,370.00	01151054	1/24/2015	\$1,155.00	35 Oakview Rd, Matteson	31-17-206-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			01151069	1/26/2015	\$1,020.00	20318 Fairfield, Oly F	31-14-401-012-0000	Mack Industries II LLC
			01151069	1/26/2015	-\$30.00	20318 Fairfield, Oly F	31-14-401-012-0000	Mack Industries II LLC
			12142230	12/19/2014	-\$30.00	18331 Hickory, Lansing	29-36-404-014-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142230	12/19/2014	\$810.00	18331 Hickory, Lansing	29-36-404-014-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
			12142268	12/29/2014	-\$30.00	3210 Woodworth, HC	28-26-408-053-0000	Mack Industries II LLC
			12142268	12/29/2014	\$900.00	3210 Woodworth, HC	28-26-408-053-0000	Mack Industries II LLC
			12142267	12/29/2014	-\$60.00	3316 Birchwood Dr, HC	28-26-205-018-0000	Mack Industries II LLC
			12142267	12/29/2014	\$1,020.00	3316 Birchwood Dr, HC	28-26-205-018-0000	Mack Industries II LLC
			11142089 11/5/14	12/30/2014	\$840.00	17543 Roy, Lansing	30-29-309-047-0000	Mack Industries II LLC
3/13/2015	76598	\$15,118.00	10142010 10/15	12/31/2014	\$780.00	16941 Glen Oaks Dr, CCH	28-26-120-026-0000	Wesley M. Rosenthal 2014 Trust
			10142043 10/24	12/31/2014	\$1,110.00	17848 Roy St, Lansing	30-32-101-031-0000	Akhil Saklecha
			12142206 12/10	12/31/2014	\$840.00	18610 Maple	31-03-215-009-0000	Mack Industries Ltd.
			12142266	12/31/2014	\$990.00	6820 Maplewood, Chicago	19-24-409-025-0000	Mack Industries V LLC
			12142181 12/1	12/31/2014	\$1,080.00	547 Regent, Univ Park	21-14-13-214-003	Mack Industries V LLC
			01151100	1/30/2015	\$750.00	16907 Forest View, Tinley	28-30-214-018-0000	Mack Industries V LLC
			01151099	1/30/2015	\$900.00	18760 Loretto Ln, CCH	31-03-305-011-0000	Mack Industries II LLC
			01151098	1/30/2015	\$660.00	1722 168th St, HC	29-30-206-015-0000	Mack Industries II LLC
			01151097	1/30/2015	\$1,050.00	23 Sycamore, Glenwood	32-03-407-012-0000	Mack Industries II LLC
			01151095	1/30/2015	\$780.00	714 Circle, Univ Park	21-14-12-405-026	Mack Industries II LLC
			01151094	1/30/2015	\$1,140.00	657 W Exchange, Crete	23-15-08-419-010	Mack Industries V LLC
			01151096	1/30/2015	\$840.00	552 Irving Pl, Univ Park	21-14-13-217-021	Mack Investments I LLC
			01151091	1/31/2015	\$1,167.00	513 North St, Crete	23-15-09-309-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
			02151109	2/3/2015	\$990.00	751 E. 164th Pl, SH	29-22-213-029-0000	Mack Industries II LLC
			02151108	2/3/2015	\$1,020.00	3740 N Page, Chicago	12-23-222-023-0000	Mack Investments I LLC
			02151111	2/5/2015	\$720.00	10822 Church, Chicago	25-17-300-035-0000	Mack Investments I LLC
			02151142	2/12/2015	\$1,020.00	738 May St, Cal City	30-18-217-051-0000	Mack Industries II LLC

Ex. A - Transfers and Invoices

Check Date	Check No.	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address	PIN	Owner on Invoice Date
			02151140	2/12/2015	\$1,458.00	223 20th Ct., Lockport	11-04-26-119-004	Mack Industries V LLC
			02151141	2/12/2015	\$930.00	17422 Community, Lansing	30-29-302-045-0000	Mack Industries II LLC
			02151138	2/13/2015	\$2,683.00	727 S Finley Rd, Lombard	06-18-103-006	Mack Industries V LLC
			02151149	2/17/2015	\$1,080.00	807 E 191st Pl, Glenwood	32-11-104-008-0000	Gecko Mack
			02151147	2/17/2015	\$1,230.00	658 Mackinaw, Cal City	30-07-430-035-0000	Mack Industries II LLC
			02151148	2/17/2015	\$720.00	20073 Terrace, Lynwood	33-07-305-003-0000	Mack Industries II LLC
			02151157	2/18/2015	\$1,140.00	19000 Keeler, CCH	31-03-406-012-0000	Mack Industries II LLC
			02151153	2/18/2015	\$960.00	2711 Larkspur Ln, HC	28-36-223-009-0000	Mack Industries II LLC
3/27/2015	76902	\$9,930.00						
			02151169	2/23/2015	\$660.00	1358 W 109th Pl, Chicago	25-17-319-024-0000	Mack Industries V LLC
			02151170	2/23/2015	\$1,410.00	119 W. Rose, Glenwood	32-03-315-025-0000	Mack Industries II LLC
			02151171	2/23/2015	\$810.00	219 E. Rose St, Glenwood	32-03-409-012-0000	Mack Industries II LLC
			02151172	2/24/2015	\$1,080.00	17908 Hickory St, Lansing	29-36-201-121-0000	Mack Industries II LLC
			02151173	2/24/2015	\$1,080.00	17416 Community, Lansing	30-29-302-043-0000	Mack Industries II LLC
			02151174	2/24/2015	\$510.00	17923 Community, Lansing	30-31-109-033-0000	Gecko Mack-17912 Commercial Lansing
			02151180	2/25/2015	\$1,020.00	1445 Linden Rd, Homewood	29-32-304-062-0000	Mack Industries V LLC
			02151182	2/25/2015	\$1,440.00	17725 Maple Ave, CCH	28-34-210-002-0000	Mack Industries II LLC
			02151179	2/25/2015	\$1,020.00	18018 Wentworth, Lansing	30-32-119-060-0000	Mack Industries II LLC
			02151181	2/25/2015	\$900.00	21209 Oak St, Matteson	31-23-401-020-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:	Chapter 7
Mack Industries, Ltd., et al., Debtors. ¹	Bankruptcy No. 17-09308 (Jointly Administered) Honorable Carol A. Doyle
<hr/> Ronald R. Peterson , as chapter 7 trustee for Mack Industries Ltd., Plaintiff, v. River West Realty Inc., Defendant.	Adversary No. 19-00508

AMENDED COMPLAINT

1. Mack Industries Ltd. (the “Debtor”) transferred \$214,534.02 to River West Realty Inc. not for its own benefit, but for the benefit of other entities. The Debtor got no value for the transfers, which it made while insolvent and as part of a scheme to hinder, delay, and defraud its creditors, including American Residential Leasing Company LLC. Therefore, Ronald R. Peterson, as chapter 7 trustee for the Debtor, (the “Trustee”) seeks to avoid and recover those transfers for the estate’s benefit.

¹ The debtors, with their respective bankruptcy case numbers, are as follows: Mack Industries, Ltd. (17-09308); Oak Park Avenue Realty, Ltd. (17-16651); Mack Industries II, LLC (17-16859); Mack Industries III, LLC (17-17106); Mack Industries IV, LLC (17-17109); Mack Industries V, LLC (18-03445); and Mack Industries VI, LLC (18-03451).

JURISDICTION AND VENUE

2. This adversary proceeding arises in the chapter 7 bankruptcy case of Mack Industries Ltd., pending before this Court as case number 17-09308.

3. Pursuant to 28 U.S.C. § 1334(b), this Court has subject matter jurisdiction over this proceeding, which is referred here pursuant to 28 U.S.C. § 157(b) and Local Rule 40.3.1(a) of the United States District Court for the Northern District of Illinois.

4. This is a core proceeding under 28 U.S.C. § 157(b)(2)(H), and this Court has constitutional authority to enter final judgments and orders herein. If a court determines that any portion of this proceeding is not a core proceeding or that a bankruptcy judge does not have constitutional authority to enter final judgments in this proceeding, the Trustee consents, pursuant to 28 U.S.C. § 157(c), to a bankruptcy judge hearing and finally determining the proceeding and entering appropriate orders and judgments.

5. This Court is the proper venue for this adversary proceeding pursuant to 28 U.S.C. §§ 1408 and 1409.

GENERAL ALLEGATIONS

1. The McClelland family entities.

6. The Debtor was created in 1998 and was owned by James K. McClelland.

7. James K. McClelland and his son James H. McClelland managed the Debtor.

8. One of the Debtor's main lines of business was flipping houses: the Debtor would acquire real estate, rehab it, and then sell it or rent it to generate income.

9. Prior to 2013, the McClellands operated the real estate business in the Debtor's name, except for certain lines of business or opportunities they pursued in the names of Mack Investments I LLC, an entity owned by James K. McClelland and created in 2009; 2300-16 S. Central LLC, an entity owned by James H.

McClelland and created in 2011; and Mack Property Group Ltd., an entity created in 2009.

10. In 2013, however, the McClelland family began to create new entities owned directly or indirectly by the McClelland family.

11. The McClelland family entities included Mack Industries II LLC, Mack Investments I LLC, and others.

12. The Debtor and the McClelland family entities engaged in the business of wholesale real estate investing, management, and development.

2. River West's relationship to the McClelland family entities.

13. River West is an Illinois corporation owned by Shannon Pittacora.

14. River West located real estate to be acquired by the Debtor, McClelland family entities, and others.

15. As described in detail in this complaint, the Debtor paid River West to find real estate that other entities would acquire as part of a scheme to dissipate its assets to hinder, delay, and defraud American Residential Leasing Company LLC and to benefit the McClellands and their other entities.

3. The relationship between the Debtor and American Residential.

16. One line of business that the Debtor pursued was managing properties owned by American Residential Leasing Company LLC.

17. In December 2012, the Debtor entered into a Master Lease Agreement with American Residential.

18. Under the Agreement, the Debtor leased several hundred residential properties from American Residential.

19. Between December 2012 and January 2014, the Debtor and American Residential amended their Agreement 20 times to add additional properties.

20. Under the Agreement, the Debtor was to sublease the American Residential properties to residential tenants, and the Debtor was obligated to

maintain the properties, to pay American Residential certain rental and other fees each month, and to pay all property taxes levied against the properties.

21. Under the Agreement, the Debtor was obligated to pay American Residential monthly rents calculated from an annual base rent (the “Base Monthly Rental”) and quarterly rents based on a percentage of the Debtor’s annual gross revenues (the “Quarterly Percentage Rental”).

22. In January 2014, the Base Monthly Rental was \$405,878.13.

23. The Base Monthly Rental increased by up to 3% annually, so it increased to \$418,054.49 in February 2014, \$430,596.11 in January 2015, and \$444,514.00 in January 2016.

24. The Quarterly Percentage Rental amounts were estimated quarterly based on written statements (the “Quarterly Statements”) that the Debtor was supposed to provide to American Residential, setting forth the Debtor’s revenues for the previous quarter.

25. At the end of each year, the Debtor was also required to provide a written statement setting forth its actual gross revenue for the prior year and to pay any deficiency in the Quarterly Percentage Rental amounts actually paid during the prior year.

4. The Debtor threatens to dissipate assets if American Residential does not renegotiate the parties’ contract.

26. Beginning in summer 2014, the Debtor claimed that it was incapable of meeting its obligations under the Agreement and requested that the Agreement be modified to reduce those obligations. One of the Debtor’s primary negotiators was Eric Workman, the Debtor’s Vice President of Sales and Marketing.

27. On July 8, 2014, Workman sent an email to Christopher J. Byce (formerly Senior Vice President, Investments, of American Residential’s prior parent company) stating that “the overall economics of the Mack–ARP relationship ... is not performing at a profitability level that is sustainable to Mack.”

28. Later, on December 5, 2014, James H. McClelland, a Debtor representative and the son of the Debtor's owner, submitted a proposal to modify the Agreement via letter to Byce representing that "any substantial changes in the [proposed] terms will be untenable insofar as Mack's ability to perform under a revised agreement. Mack has exhausted all avenues to borrow the money to pay the back taxes, as the time frame and usage of funds makes this type of loan next to impossible for it to acquire."

29. In connection with the Debtor's request to modify the Agreement, its representatives made several statements revealing the Debtor's intent to engage in fraudulent conduct if American Residential did not agree to the Debtor's proposed terms.

30. Specifically, in June 2014, Workman told Byce that, absent a modification, the Debtor would transfer its assets to related entities for nothing in return to hinder American Residential's ability to exercise its legal remedies as a creditor or otherwise.

31. During the negotiations with American Residential, Workman also told Byce that the Debtor's special relationships with local authorities in Cook County and surrounding areas would prevent American Residential from exercising management and control over its properties.

32. American Residential and the Debtor were not able to agree on a modification to the Agreement.

33. The relationship between American Residential and the Debtor continued to deteriorate during the negotiations and after the negotiations failed.

34. By September 2014, the Debtor stopped making the full Base Monthly Rental Payments, and it made no payments at all in eight months between September 2014 and February 2016. American Residential calculates that the Debtor owes more than \$4.7 million for unpaid rent.

35. In 2014, the Debtor stopped paying property taxes on American Residential's properties for the years 2013 and forward. American Residential calculates that the Debtor owes more than \$6.5 million for these taxes.

36. American Residential sent the Debtor a Notice of Default on December 2, 2014.

37. Eventually, on March 21, 2016, American Residential filed a complaint against the Debtor and others in Illinois state court.

5. The parties do not agree on a modification to the Agreement, so the Debtor dissipates its assets.

38. American Residential and the Debtor were not able to agree on a modification to the Agreement.

39. Even before making its threats to American Residential, the Debtor began preparing for a possible breakdown in the business relationship.

40. In the months leading up to and during the negotiations with American Residential, the Debtor had already begun dissipating its assets. True to its threat to American Residential, the Debtor continued that dissipation when the negotiations failed.

41. Prior to 2013, the McClellands ran almost the entire real estate business in the Debtor's name.

42. In 2013, however, the McClelland family began to create new entities and to divert business opportunities and assets from the Debtor to those entities.

43. In 2013, the McClellands created at least 15 new entities. In 2014, they created at least four; in 2015, at least six; and in 2016, at least two.

44. The Debtor owned five of these new entities: Mack Industries II LLC, Mack Industries III LLC, Mack Industries IV LLC, Mack Industries V LLC, and Mack Industries VI LLC.

45. The remaining new entities were owned by James K. McClelland, James H. McClelland, or both.

46. The McClellands used these new entities to pursue business opportunities that the Debtor would have pursued in the past.

47. Although the Debtor still owned some real estate after 2013, the vast majority of real estate acquired for flipping was acquired by the new entities. In addition, the Debtor transferred real estate from itself to these new entities.

48. By acquiring real estate and other assets in the name of the new entities and transferring real estate from the Debtor to the new entities, the McClelland family reduced the assets that the Debtor had that could be collected by American Residential.

49. Compounding the situation, the Debtor drew down on its own assets to benefit these other entities.

50. The Debtor paid contractors to work on and improve the real estate owned by the other entities. It bought supplies that would be used only to improve real estate owned by the other entities. It paid bank loans incurred by the other entities. It paid for other services, such as lawyers or tax advisors, to benefit the other entities.

51. The Debtor did not get any value for making these payments. Instead, the parties that benefitted were the other entities and, ultimately, the McClellands.

52. From 2013 to 2017—the period in which the Debtor claimed that it could not pay American Residential what it owed under the Agreement—the McClelland family extracted at least \$10.7 million in cash from the Debtor and the other entities.

53. By spending its own money and getting nothing in return, the Debtor further dissipated its assets, further hindering, delaying, and defrauding American Residential while the McClellands benefitted.

54. The Debtor also concealed its dissipation from American Residential.

55. The Debtor was supposed to provide American Residential with Quarterly Statements detailing its income, but the Debtor stopped providing those reports after June 2014.

56. In 2016, after the Debtor defaulted on the Agreement, American Residential tried to take over management of its properties.

57. The Debtor, however, prevented American Residential from doing so by refusing to provide subtenant and property information that American Residential requested and was entitled to under the Agreement.

58. The Debtor's efforts to dissipate its assets to hinder, delay, and defraud American Residential continued from 2013 to March 2017, when the Debtor filed for bankruptcy.

59. The Debtor's efforts to render itself insolvent were successful.

60. The Debtor's books and records reflect that, on March 24, 2017, the date it filed for bankruptcy, the Debtor had assets of \$56.4 million and liabilities of \$71.2 million on a cash basis.

61. The Debtor's books and records reflect that, in the year prior to March 24, 2017, the Debtor had net income of negative \$7,270,679.43 on a cash basis.

62. Creditors existed with standing to bring an action against the Debtor to avoid the obligations and transfers described in this complaint under applicable non-bankruptcy law, including American Residential and the Internal Revenue Service. To the extent the IRS is a creditor, the period for avoiding obligations and transfers is at least 10 years.

63. During the course of this proceeding, the Trustee may learn (through discovery or otherwise) of additional obligations or transfers made to or for the benefit of River West during the period for which obligations or transfers can be avoided. It is the Trustee's intention to avoid and recover all obligations and transfers the Debtor made that are avoidable under 11 U.S.C. §§ 544 and 548. The Trustee reserves his right to amend his complaint to include: (i) further information regarding the obligations and transfers; (ii) additional obligations and transfers; (iii) modifications of and/or revisions to any defendant's name; (iv) additional defendants; and/or (v) additional causes of action or legal theories, if applicable, (collectively, the "Amendments") that may become known to the Trustee at any time during this adversary proceeding, through formal discovery or otherwise, and for the Amendments to relate back to the date of the original complaint.

COUNT 1 – AVOIDANCE AND RECOVERY OF CONSTRUCTIVE FRAUDULENT TRANSFERS

**740 ILCS 160/5(a)(2), 6(a), and 8(a),
and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(B), and 550(a)**

64. The Trustee incorporates the previous allegations of this complaint as though fully set forth in this count.

65. The Trustee pleads this count in the alternative to the extent the relief or the allegations contradict anything else contained in this complaint.

1. The Debtor pays River West to locate real estate that other entities would acquire.

66. Between January 10, 2013, and October 28, 2016, the Debtor made transfers to River West totaling \$214,534.02 to locate real estate that others would acquire.

67. The Debtor paid River West consulting fees for its work, as well as a commission for each property that River West located for acquisition.

68. A list of each transfer that the Debtor made to River West during the time period at issue in this complaint is attached as Exhibit A.

69. Sometimes, the Debtor would simply issue a check to River West without associating the check with any particular invoice or bill in its books and records. These transfers are listed as “Check” on Exhibit A.

70. Other times, the Debtor would enter River West’s bills into its books and records, and then make a transfer connected to those bills. These transfers are listed as “Bill Pmt” on Exhibit A. The bills that were paid by this method are listed on Exhibit A along with each “Bill Pmt”.

71. The Debtor did not specify in its books and records what portion of River West’s consulting fees were attributable to different acquisitions. The Debtor did specifically note what portion of River West’s commissions were attributable to different acquisitions.

72. The Debtor paid commissions totaling \$61,700. Of this, only 5.24% was for properties that the Debtor acquired. The remaining 94.76% was for properties

that other entities acquired. The Debtor therefore transferred \$58,468.83 to River West in commissions for finding properties that other entities acquired.

73. Applying this breakdown to River West's consulting fees, 94.76%, or \$156,065.19, was for the benefit of entities other than the Debtor.

74. The Debtor made the transfers on Exhibit A from its account no. 6212 at First Community Financial Bank or its account no. 3873 at First Personal Bank.

75. Two of the property owners on Exhibit A are land trusts owned by McClelland family entities.

76. The beneficial owner of Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345 is Mack Industries II LLC.

77. The beneficial owner of Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677 is Mack Industries II LLC.

78. In all, the Debtor transferred \$214,534.02 to River West during the time period at issue in this complaint to find real estate for entities other than the Debtor to buy.

2. The Debtor did not receive reasonably equivalent value in exchange for paying River West.

79. The transfers at issue in this complaint were for parcels of real estate that were acquired not by the Debtor but by other entities.

80. Instead, the real estate that River West located was acquired by Mack Industries II LLC, Mack Industries III LLC, Mack Industries V LLC, Mack Industries VI LLC, Mack Investments I LLC, Mack Investments II LLC, Mack LOC I LLC, Wheelhouse Investments I LLC, and others

81. Because the Debtor did not own the real estate that River West located, the Debtor did not benefit at all from River West's services.

82. The Debtor did not benefit from paying River West for these services.

83. By paying River West, the Debtor transferred away assets and got no benefit in return.

84. Therefore, the Debtor did not receive a reasonably equivalent value for the transfers detailed in this complaint.

3. The Debtor was insolvent at the time it made the transfers to River West.

85. The transfers at issue in this complaint occurred between January 10, 2013, and October 28, 2016.

86. The Debtor's books and records reflect that, on June 20, 2014, the Debtor's liabilities exceeded its assets by \$616,340.16.

87. The Debtor's books and records reflect that, on July 31, 2014, the Debtor's liabilities exceeded its assets by \$2,016,009.01.

88. The Debtor's liabilities exceeded its assets on each date after July 31, 2014, until it filed for bankruptcy on March 24, 2017.

89. The Debtor's books and records reflect that, on March 24, 2017, the Debtor's liabilities exceeded its assets by \$14,794,001.84.

90. The Debtor's books and records reflect that, each month between January 10, 2013, and July 31, 2014, the Debtor's assets exceeded its liabilities by an average of just \$1,188,914.71. During that period, the Debtor's assets each month averaged just \$29,508,792.88, while its liabilities each month averaged \$28,319,878.16.

91. The Debtor's earnings decreased significantly between January 2013 and July 2014, further demonstrating its fragile financial position. The Debtor's average monthly net income for 2013 was \$236,456.86, but for 2014 it was negative \$528,550.83.

92. Because the Debtor was losing money so rapidly, it was not generating sufficient profits to sustain its operations, particularly because its equity was only about 4% of the value of its assets.

93. In fact, because the Debtor was losing money, by July 31, 2014, the Debtor was balance sheet insolvent and remained so until it filed for bankruptcy.

94. During the time period at issue in this complaint—that is, between January 10, 2013, and March 24, 2017—the Debtor’s net income was negative \$15,993,703.27.

95. During the time period at issue in this complaint, the Debtor was incurring debts and was not paying those debts as they became due.

96. The Debtor’s accounts payable had the following ages on these dates:

Date	Current	1-30 days	31-60 days	61-90 days	>90 days	Total
3/24/17	\$88.95	\$33,430.70	\$104,680.13	\$130,236.00	\$1,095,240.77	\$1,363,676.55
3/24/16	24,381.64	698,503.00	135,109.83	488,291.47	486,178.82	1,832,464.76
3/24/15	14,860.23	875,471.28	16,842.69	12,352.79	151,191.69	1,070,718.68
3/24/14	60,911.57	496,109.35	137,838.42	90,254.86	38,243.01	823,357.21
3/24/13	15,141.03	911,193.57	308,858.07	14,481.28	19,697.12	1,269,471.07
1/10/13	14,502.93	633,869.52	207,467.82	59,162.42	24,576.05	939,578.74

Wherefore, the Trustee requests that this Court enter judgment in his favor and against River West (a) avoiding the transfers, (b) entering a money judgment against River West in the amount of \$214,534.02 or such higher amount as may be established at trial, plus interest from the date of each transfer at the maximum legal rate, costs, and expenses of this action including, without limitation, attorneys’ fees, and (c) granting any additional relief that is appropriate under the circumstances.

COUNT 2 – AVOIDANCE AND RECOVERY OF ACTUAL FRAUDULENT TRANSFERS

740 ILCS 160/5(a)(1) and 8(a) and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(A), and 550(a)

97. The Trustee incorporates the previous allegations of this complaint as though fully set forth in this count.

98. The Trustee pleads this count in the alternative to the extent the relief or the allegations contradict anything else contained in this complaint.

99. As described above, the Debtor engaged in a scheme to hinder, delay, and defraud American Residential by transferring away its assets, reducing what American Residential could collect and improving the position of the McClellands and their other entities.

100. As part of its scheme to hinder, delay, and defraud American Residential, the Debtor paid River West \$214,534.02 to find real estate that Mack Industries II LLC, Mack Investments I LLC, and others would acquire, as described in detail above.

101. Each transfer to River West reduced the Debtor's assets, leaving less for American Residential to collect.

102. Each transfer to River West benefitted the other entities, benefitting the McClelland family at the expense of American Residential.

103. The Debtor did not disclose the transactions with River West to American Residential. The Debtor stopped providing the required disclosures to American Residential in June 2014.

104. The Debtor made the transfers between January 2013 and October 2016. American Residential issued a notice of default in December 2014.

105. As described in detail above, the Debtor did not get any value for making the payments to River West because it did not acquire the real estate that River West located.

106. As described in detail above, the Debtor was insolvent at the time it made the transfers to River West.

Wherefore, the Trustee requests that this Court enter judgment in his favor and against River West (a) avoiding the transfers, (b) entering a money judgment against River West in the amount of \$214,534.02 or such higher amount as may be established at trial, plus interest from the date of each transfer at the maximum legal rate, costs, and expenses of this action including, without limitation, attorneys'

fees, and (c) granting any additional relief that is appropriate under the circumstances.

Dated: March 13, 2020

Respectfully submitted,

Ronald R. Peterson, as chapter 7
trustee for Mack Industries Ltd.

By: /s/ Jeffrey K. Paulsen
One of His Attorneys

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EXHIBIT A

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Check	1/10/2013	51136	Consulting Fees	First Personal #3873	\$1,188.00						
Bill Pmt	1/11/2013	51366		First Personal #3873	\$3,300.00						
						October 2012	1/11/2013	\$1,000.00			Consulting Fees
						November 2012	1/11/2013	\$1,050.00			Consulting Fees
						December 2012	1/11/2013	\$1,250.00			Consulting Fees
Bill Pmt	1/25/2013	51787		First Personal #3873	\$1,320.00						
							1/25/2013	\$1,320.00			Consulting Fees
Bill Pmt	2/8/2013	52145		First Personal #3873	\$1,320.00						
							2/8/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	2/8/2013	52246	January 2013	First Personal #3873	\$1,850.00						
						January 2013	1/31/2013	\$50.00	2633 W. 99th St., Chicago	24-12-402-041-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	19733 Orchard, Lynwood	33-07-104-050-0000	Mack Industries Ltd.
						January 2013	1/31/2013	\$50.00	18519 Carriage Lane, Lansing	29-36-413-025-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	556 Riverview Dr., South Holland	29-15-411-022-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	22127 Belmont Rd., Richton Park	31-27-307-020-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	18348 Oakwood, Lansing	30-31-409-017-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	19000 Hamlin, Flossmoor	31-02-316-011-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	4051 Russet Way, Country Club Hills	28-27-407-009-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	20600 Bensley Ave, Lynwood	32-13-401-074-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	3429 W 124th St, Alsip	24-26-408-002-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	17909 Chartres Ct, Hazel Crest	28-35-403-001-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	2316 E 207th St., Lynwood	32-13-401-033-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	1232 E 146th St, Dolton	29-02-433-010-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	14446 Kenwood, Dolton	29-02-418-030-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	3838 216th Pl, Matteson	31-26-107-062-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	14337 Kimbark, Dolton	29-02-410-012-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	15525 S Maple St., South Holland	29-15-206-006-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	3420 218th St., Matteson	31-26-210-009-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	20043 Monterey Ave., Lynwood	33-07-314-008-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	20079 Terrace, Lynwood	33-07-305-002-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	18964 Wildwood Ave, Lansing	33-06-214-021-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	18444 Palmer Ave., Homewood	32-06-106-012-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	18030 Oak St., Lansing	30-31-112-019-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	16520 Prairie, South Holland	29-22-111-008-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	15225 Kilpatrick, Oak Forest	28-15-105-030-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	944 E 163rd Pl, South Holland	29-23-107-034-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	4032 Violet Ln., Matteson	31-22-209-020-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	1306 E. 170th St., South Holland	29-23-400-021-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	2732 174th St., Hazel Crest	28-25-410-013-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	402 Seward St., Park Forest	31-24-302-016-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	1043 Blackhawk, University Park	21-14-13-401-032 (Will)	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	15960 Dobson, South Holland	29-14-315-022-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	1356 Jill Terrace, Homewood	32-05-323-023-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	440 Paxton, Calumet City	29-12-131-051-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	5619 Allemong, Matteson	31-17-214-005-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	18201 Ravisloe Terrace, Country Club Hills	28-34-422-003-0000	Mack Investments I LLC
						January 2013	1/31/2013	\$50.00	15727 Prince Dr, South Holland	29-14-221-017-0000	Mack Investments I LLC
Bill Pmt	2/22/2013	52568		First Personal #3873	\$1,270.50						
							2/22/2013	\$1,270.50	Acquisitions Department		Consulting Fees
Bill Pmt	3/8/2013	53019		First Personal #3873	\$1,204.50						
							3/8/2013	\$1,204.50	Acquisitions Department		Consulting Fees
Bill Pmt	3/22/2013	53434		First Personal #3873	\$1,221.00						
							2/28/2013	\$1,221.00	Acquisitions Department		Consulting Fees
Bill Pmt	3/22/2013	53499	February 2013 Commissions	First Personal #3873	\$1,650.00						
						February 2013	3/22/2013	\$50.00	4205 Poplar Ave., Richton Park	31-27-403-008-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	18534 Chicago Ave., Lansing	30-31-427-005-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	1053 Riverview Dr., South Holland	29-14-313-014-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	237 E Maple, Glenwood	32-03-412-034-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	15451 Cherry St, South Holland	29-15-207-011-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	3665 178th St, Lansing	30-32-200-079-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	18116 Chicago, Lansing	30-31-223-016-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	4 Alexander Court, Bollingbrook	07-01-35-203-025-0000 (Will)	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	15 N. Elm, Glenwood	32-03-421-015-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	2313 185th, Lansing	29-36-409-016-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	450 Saginaw, Calumet City	30-07-126-034-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	435 Mackinaw, Calumet City	30-07-216-003-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	18130 Ravisloe Terrace, Country Club Hills	28-34-408-050-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	422 E Maple Dr., Glenwood	32-03-411-034-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	17835 S Dekker, Lansing	29-36-201-171-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	6225 W 87th St, Oak Lawn	24-05-109-032-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	18024 Edwards, Country Club Hills	28-34-409-015-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	15146 Drexel, South Holland	29-11-317-007-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	3812 Pear Tree, Country Club Hills	28-26-307-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						February 2013	3/22/2013	\$50.00	16615 Dobson, South Holland	29-23-307-012-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	3524 190th St., Lansing	33-05-308-017-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	18016 Commercial, Lansing	30-31-116-058-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	2920 195 St, Lynwood	33-07-206-049-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	17922 Rose Ave., Lansing	29-36-200-121-0000	Mack Investments I LLC

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						February 2013	3/22/2013	\$50.00	959 E 159th Pl, South Holland	29-14-314-002-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	19234 Wentworth, Lansing	33-05-320-028-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	3120 Edmond, Olympia Fields	31-13-301-026-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	16117 Prairie, South Holland	29-15-310-009-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	14337 Ellis, Dolton	29-02-312-012-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						February 2013	3/22/2013	\$50.00	370 Mackinaw Ave., Calumet City	30-07-207-016-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						February 2013	3/22/2013	\$50.00	19908 Brook, Lynwood	33-07-320-019-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	330 Maple, Glenwood	32-03-411-040-0000	Mack Investments I LLC
						February 2013	3/22/2013	\$50.00	16133 Michigan, South Holland	29-15-303-043-0000	Mack Investments I LLC
Bill Pmt	4/5/2013	53922		First Personal #3873	\$1,221.00		4/5/2013	\$1,221.00	Acquisitions Department		Consulting Fees
Bill Pmt	4/19/2013	60156		First Community Operating #6212	\$1,204.50		4/19/2013	\$1,204.50	Acquisitions Department		Consulting Fees
Bill Pmt	4/19/2013	60243	March 2013 Commissions	First Community Operating #6212	\$1,900.00	March 2013	3/31/2013	\$50.00	14507 Irving, Dolton	29-03-427-066-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	17810 Park Ave., Lansing	30-31-204-024-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	606 Buffalo, Calumet City	30-07-420-028-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	16749 Sunset Ridge, Country Club Hills	28-26-104-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	40 S Wabash, Glenwood	32-03-323-012-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	14242 Shepard, Dolton	29-03-406-004-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	129 N Wabash, Glenwood	32-03-301-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	4111 Russet Way Dr, Country Club Hills	28-27-407-004-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	18351 S. Center, Homewood	32-05-200-033-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	17540 Greenbay, Lansing	30-30-410-060-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	796 E 163rd St., South Holland	29-22-201-072-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	302 Clyde Ave, Calumet City	29-12-105-057-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	17302 Emerson, Hazel Crest	28-25-318-018-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	3119 W 103rd St, Chicago	24-13-101-048-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	17313 Kedzie, Hazel Crest	28-25-316-007-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	2925 Willow Rd, Homewood	31-01-108-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	16506 Woodlawn, South Holland	29-22-114-012-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	20109 Catalpa, Lynwood	33-07-412-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	18321 S. Cicero, Country Club Hills	31-03-102-002-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	3305 Maple, Hazel Crest	28-26-407-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	4351 Scott, Oak Forest	28-22-414-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	3044 183rd St, Lansing	30-31-406-040-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	449 Campbell, Calumet City	30-07-134-034-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	9371 Country Club, Evergreen Park	24-01-412-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	4047 Indian Hill, Country Club Hills	28-27-408-013-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	3317 Chestnut Ct., Hazel Crest	28-26-207-016-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	2836 W 99th St, Evergreen Park	24-12-125-025-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	613 Buffalo, Calumet City	30-07-421-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						March 2013	3/31/2013	\$50.00	22511 Arquilla Dr, Richton Park	31-33-105-017-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	14800 Homan, Midlothian	28-11-407-039-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	3859 171st St., Country Club Hills	28-26-304-017-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	526 N Illinois, Glenwood	32-05-219-040-0000	Mack Industries Ltd.
						March 2013	3/31/2013	\$50.00	934 E 161 Pl, South Holland	29-14-311-027-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	3410 Ann St, Lansing	30-32-314-020-0000	Mack Investments I LLC
						March 2013	3/31/2013	\$50.00	430 Prairie, Calumet City	29-12-125-022-0000	Mack Industries Ltd.
						March 2013	3/31/2013	\$50.00	14225 Ingleside, Dolton	29-02-303-014-0000	Mack Industries Ltd.
						March 2013	3/31/2013	\$50.00	16112 University, South Holland	29-14-316-036-0000	Mack Industries Ltd.
						March 2013	3/31/2013	\$50.00	8724 Sacramento, Evergreen Park	24-01-117-057-0000	Mack Investments I LLC
Bill Pmt	5/3/2013	60649		First Community Operating #6212	\$1,113.75		5/3/2013	\$1,113.75	Acquisitions Department		Consulting Fees
Bill Pmt	5/17/2013	61107		First Community Operating #6212	\$1,155.00		5/17/2013	\$1,155.00	Acquisitions Department		Consulting Fees
Bill Pmt	5/17/2013	61191	April 2013 Commissions	First Community Operating #6212	\$1,500.00	April 2013	4/30/2013	\$50.00	517 157th St, Calumet City	30-17-124-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	3681 175th Pl., Country Club Hills	28-35-110-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	3417 W 116th, Chicago	24-23-407-012-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	9111 Central, Oak Lawn	24-04-300-005-0000	Mack Investments I LLC
						April 2013	4/30/2013	\$50.00	17434 Burnham, Lansing	30-30-409-031-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	17314 Poe Ave, Hazel Crest	28-25-316-033-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	17806 Ridgewood, Lansing	30-31-202-025-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	2356 184th St., Lansing	29-36-403-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	5208 Keith Dr, Richton Park	31-33-210-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	421 S Harper, Glenwood	32-11-212-024-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	17148 Longfellow, Hazel Crest	28-25-303-027-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	2804 Woodworth, Hazel Crest	28-25-311-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						April 2013	4/30/2013	\$50.00	3912 W 168th Pl, Country Club Hills	28-26-100-058-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	640 Gordon, Calumet City	30-08-325-013-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	17518 Community, Lansing	30-29-309-053-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	633 E 162nd Pl, South Holland	29-22-022-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	17041 Winchester, Hazel Crest	29-30-224-048-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	527 Monroe St, Dolton	29-03-311-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	3417 Chestnut Dr., HC	28-26-206-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	323 Manistee, Calumet City	30-07-111-002-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	4312 Andover, Richton Park	31-27-409-024-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						April 2013	4/30/2013	\$50.00	18812 Oakwood, Country Club Hills	31-03-418-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						April 2013	4/30/2013	\$50.00	18011 Baker, Country Club Hills	28-34-309-002-0000	Mack Industries Ltd.
						April 2013	4/30/2013	\$50.00	286 Calhoun Ave., Calumet City	29-12-205-025-0000	Mack Investments I LLC
						April 2013	4/30/2013	\$50.00	3412 Schultz, Lansing	30-32-323-011-0000	Mack Investments I LLC
						April 2013	4/30/2013	\$50.00	3668 Adams, Lansing	30-32-022-041-0000	Mack Industries Ltd.
						April 2013	4/30/2013	\$50.00	22200 Windsor Ct, Richton Park	31-27-308-026-0000	Mack Industries Ltd.
						April 2013	4/30/2013	\$50.00	14411 Murray, Dolton	29-03-420-049-0000	Mack Industries Ltd.
						April 2013	4/30/2013	\$50.00	4227 Greenbriar Ln., Richton Park	31-27-411-013-0000	Mack Investments I LLC
						April 2013	4/30/2013	\$50.00	1546 Wentworth, Calumet City	30-20-309-038-0000	Mack Industries Ltd.
Check	5/31/2013	61528	Consulting Fees	First Community Operating #6212	\$1,254.00						
Check	6/14/2013	62175	Consulting Fees	First Community Operating #6212	\$1,237.50						
Bill Pmt	6/27/2013	62530	May 2013 Commissions	First Community Operating #6212	\$1,150.00						
						May 2013	6/20/2013	\$50.00	16428 Wabash, South Holland	29-22-112-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	3614 Covertry, Hazel Crest	28-26-310-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	1014 Eagle Point, Matteson	31-20-116-002-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	651 E 144th St, Dolton	29-03-417-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	4936 153rd St, Oak Forest	28-16-213-033-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	3406 Birchwood, Hazel Crest	28-26-205-020-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	2640 W 90th St., Evergreen Park	24-01-215-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	3614 176th Pl, Lansing	30-29-406-050-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	1112 Abbott, University Park	21-14-13-401-067 (Will)	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	16159 Long, Oak Forest	28-21-109-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	3761 W 176th St, Country Club Hills	28-35-105-009-0000	Mack Industries Ltd.
						May 2013	6/20/2013	\$50.00	307 Chappel, Calumet City	29-12-105-043-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	9011 Mansfield Dr., Tinley Park	27-34-415-034-0000	Mack Industries Ltd.
						May 2013	6/20/2013	\$50.00	15419 University, Dolton	29-14-135-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	441 Normal Ave, Chicago Heights	32-16-125-017-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	23 Arrowhead Dr, Thornton	29-27-404-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	18450 Oakwood, Country Club Hills	30-31-417-023-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	18531 Glen Oaks, Lansing	30-31-319-038-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	1516 Wentworth, Calumet City	30-20-309-041-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	391 Merrill Ave, Calumet City	29-12-123-059-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	1617 183rd St, Homewood	32-06-224-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	11621 Kildare, Alsip	24-22-422-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						May 2013	6/20/2013	\$50.00	652 Paxton, Calumet City	29-12-319-012-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
Bill Pmt	6/28/2013	62438		First Community Operating #6212	\$1,320.00		6/28/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	7/12/2013	62752	7/1-7/14	First Community Operating #6212	\$1,320.00		7/12/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	7/26/2013	63106	7/15-7/28	First Community Operating #6212	\$1,320.00		7/25/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	7/26/2013	63111	June 2013	First Community Operating #6212	\$2,050.00						
						June 2013	7/19/2013	\$50.00	14844 Cottage Gr, Dolton	29-10-225-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	1832 W 183rd St, Homewood	29-31-415-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	18006 Glen Oak Ave, Lansing	30-31-102-048-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	16401 Prairie Ave, South Holland	29-22-112-030-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	14545 University, Dolton	29-02-332-047-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	14548 Keystone, Midlothian	28-10-221-014-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	1204 E 154th, South Holland	29-11-400-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	23 167th St, Calumet City	30-29-202-038-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	650 Pulaski, Calumet City	30-07-431-032-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	18102 Orleans, Hazel Crest	28-35-412-001-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	7 Cottage Rowe, Midlothian	28-04-302-008-0000	Mack Industries Ltd.
						June 2013	7/19/2013	\$50.00	394 Chappel Ave, Calumet City	29-12-120-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	17842 Commercial, Lansing	30-31-106-034-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	Fay's Point:Townhomes		Mack Investments I LLC
						June 2013	7/19/2013	\$50.00	3551 W 212th Pl, Matteson	31-23-404-004-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	17904 Rose, Lansing	29-36-200-151-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	9535 Utica, Evergreen Park	24-12-103-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	15130 Jeffery, Calumet City	29-12-310-068-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	3711 215th St, Matteson	31-26-104-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	262 Clyde Ave., Calumet City	29-12-105-047-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	655 Hirsch, Calumet City	30-08-324-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	17839 Chicago Ave, Lansing	30-31-204-049-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	491 Exchange Ave, Calumet City	30-07-306-011-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	375 Calhoun Ave., Calumet City	29-12-222-002-0000	Mack Investments I LLC
						June 2013	7/19/2013	\$50.00	3924 W 143rd, Crestwood	28-02-319-033-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	619 Buffalo, Calumet City	30-07-421-021-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	15021 Evers, Dolton	29-10-402-010-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	21140 Maple, Matteson	31-23-301-065-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	22517 Latonia, Richton Park	31-34-104-005-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2013	7/19/2013	\$50.00	5532 LaPalm Dr, Oak Forest	28-09-304-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	14829 Evers, Dolton	29-10-220-013-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	3311 Charlemagne, Hazel Crest	28-35-411-002-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	3152 191st St, Lansing	33-06-403-022-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	17820 Baker, Country Club Hills	28-34-106-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	468 Joyce St, South Holland	29-22-200-098-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	14329 Yates, Burnham	29-01-406-017-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						June 2013	7/19/2013	\$50.00	14245 S Marquette, Burnham	30-06-301-020-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	3338 Washington, Lansing	30-32-117-017-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	17502 Greenbay Ave, Lansing	30-30-410-052-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	2746 178th, Lansing	30-30-314-033-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						June 2013	7/19/2013	\$50.00	15420 Ingleside, Dolton	29-14-130-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
Bill Pmt	8/9/2013	63427	7/29-8/9	First Community Operating #6212	\$1,320.00		8/9/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	8/23/2013	63672	July 2013 Commissions	First Community Operating #6212	\$2,100.00	July 2013 Commission	8/23/2013	\$50.00	1030 Monterey Ct, University Park	21-14-13-216-031 (Will)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	3515 Woodworth, Hazel Crest	28-26-405-028-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	17112 Elm St, Hazel Crest	28-26-404-026-0000	Mack Investments I LLC
						July 2013 Commission	8/23/2013	\$50.00	30 N Willow, Glenwood	32-03-406-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	14631 Harvard, Dolton	29-09-107-075-0000	Mack Investments I LLC
						July 2013 Commission	8/23/2013	\$50.00	15318 Dorchester, Dolton	29-11-429-038-0000	Mack Investments I LLC
						July 2013 Commission	8/23/2013	\$50.00	12631 S Page, Calumet Park	25-30-424-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	1391 Buffalo Ave, Calumet City	30-19-217-011-0000	Mack Investments I LLC
						July 2013 Commission	8/23/2013	\$50.00	18416 Walter St, Lansing	30-32-316-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	4620 Farmington, Richton Park	31-34-102-032-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	290 Luella, Calumet City	29-12-200-033-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	15529 Elm St, South Holland	29-15-205-007-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	14733 Kimbark, Dolton	29-11-211-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	3312 Hickory, Hazel Crest	28-26-402-028-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	298 Clyde Ave, Calumet City	29-12-105-056-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	4720 181st, Country Club Hills	28-34-300-026-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	801 Sibley Blvd, Calumet City	30-07-401-038-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	14 Oakview Rd, Matteson	31-17-203-007-0000	Mack Investments I LLC
						July 2013 Commission	8/23/2013	\$50.00	716 Blackhawk Dr, University Park	21-14-12-404-008	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	738 E 169th St, South Holland	29-22-414-016-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	3812 W 168th Pl, Country Club Hills	28-26-107-041-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	9624 Troy Ave, Evergreen Park	24-12-110-010-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	3658 177th St, Lansing	30-29-401-104-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	15518 Elm Street, South Holland	29-15-204-007-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	4910 Bayview Dr, Richton Park	31-28-404-026-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	3047 Rosiclare Ct, South Chicago Heights	32-32-121-018-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	4524 W 175th Pl, Country Club Hills	28-34-113-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	363 Calhoun, Calumet City	29-12-214-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	8610 S Laverne, Burbank	19-33-405-023-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	17307 Wentworth, Lansing	30-29-206-016-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	18521 Ridgewood, Lansing	30-31-427-032-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	1049 Abbott Ln, University Park	21-14-13-405-013 (Will)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	6 North Pine, Glenwood	32-03-421-012-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	513 North St, Crete	23-15-09-309-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	4740 W 181st, Country Club Hills	28-34-300-024-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	921 Union Ave, University Park	21-14-13-214-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	2640 1st Private Rd, Flossmoor	31-12-401-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	5304 Imperial, Richton Park	31-33-102-007-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	17726 Roy, Lansing	30-29-320-051-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	14234 Minerva, Dolton	29-02-305-030-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	297 Stoney Island, Calumet City	29-12-108-102-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						July 2013 Commission	8/23/2013	\$50.00	270 Madison, Calumet City	29-12-102-081-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
Bill Pmt	8/23/2013	63745		First Community Operating #6212	\$1,303.50	Shannon Pittacora	8/23/2013	\$1,303.50	Acquisitions Department		Consulting Fees
Bill Pmt	9/6/2013	64081	Shannon Pittacora 8/19-9/1	First Community Operating #6212	\$1,320.00	Shannon Pittacora	9/6/2013	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	9/20/2013	64396	Shannon Pittacora 9/9/13 - 9/22/13	First Community Operating #6212	\$1,270.50	Shannon Pittacora	9/20/2013	\$1,270.50	Acquisitions Department		Consulting Fees
Bill Pmt	9/20/2013	64502	August 2013 Commissions	First Community Operating #6212	\$3,050.00	August 2013 Commissi	9/20/2013	\$50.00	3322 Woodworth, Hazel Crest	28-26-408-037-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	18711 Lee St, Country Club Hills	31-03-305-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	108 Sauk Trail, Park Forest	31-36-104-053-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	16665 S Park Ave, South Holland	29-22-402-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	515 Circle Dr, University Park	21-14-12-409-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	2748 181st St, Lansing	30-31-117-108-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	610 Bensley, Calumet City	29-12-420-029-0000	Mack Industries Ltd.
						August 2013 Commissi	9/20/2013	\$50.00	11319 S Sawyer, Chicago	24-23-212-016-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	3529 212th Place, Matteson	31-23-404-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	228 E 140th Pl, Dolton	29-03-112-008-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	709 E 155th Pl, South Holland	29-15-216-001-0000	American Residential Leasing Co. LLC
						August 2013 Commissi	9/20/2013	\$50.00	22703 Ridgeway Ave, Richton Park	31-35-302-025-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	4236 Clark Dr, Richton Park	31-27-403-022-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	14627 Avalon, Dolton	29-11-201-040-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	513 Greenbay, Calumet City	30-07-407-018-0000	Mack Industries Ltd.
						August 2013 Commissi	9/20/2013	\$50.00	14243 Ingleside, Dolton	29-02-303-020-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	15114 Oak, Dolton	29-10-409-016-0000	Mack industries Ltd.
						August 2013 Commissi	9/20/2013	\$50.00	747 Newell, Calumet City	30-18-217-010-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	521 157th St, Calumet City	30-17-124-008-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	14621 Avers Ave, Midlothian	28-11-126-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	525 Gordon, Calumet City	30-08-303-025-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						August 2013 Commissi	9/20/2013	\$50.00	841 Princeton Ave, Matteson	31-20-204-008-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	3511 Bordeaux Ct, Hazel Crest	28-35-408-102-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	17535 William St, Lansing	30-29-311-042-0000	Mack Industries Ltd.
						August 2013 Commissi	9/20/2013	\$50.00	17209 Hawthorne, East Hazel Crest	29-30-408-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	15311 Woodlawn, Dolton	29-11-422-013-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	19010 Cedar Ave, Country Club Hills	31-03-403-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	7831 Melvina Ave, Burbank	19-29-312-012-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	1287 Arthur, Calumet City	30-19-221-018-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	451 Hirsch Ave, Calumet City	30-08-109-054-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	635 Gordon, Calumet City	30-08-326-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	17903 Lorenz Ave, Lansing	30-31-213-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	19528 Sycamore, Mokena	19-09-10-316-010 (Will)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	14230 Marquette, Burnham	30-06-300-056-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						August 2013 Commissi	9/20/2013	\$50.00	1295 Mackinaw, Calumet City	30-19-207-043-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	8202 Lamont, Burbank	19-33-201-015-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	18841 Cedar St, Country Club Hills	31-03-412-031-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	134 Laura Ln, Thornton	29-27-311-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	520 169th St, South Holland	29-22-410-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	5409 W 88th St, Oak Lawn	24-04-114-005-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	3743 167th Place, Country Club Hills	28-26-105-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	518 156th Place, Calumet City	30-17-116-034-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	4700 Salem Ct, Richton Park	31-27-303-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	17204 Bernadine St, Lansing	30-29-126-012-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	17861 Princeton Ln, Country Club Hills	28-35-119-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	2231 S 61st Ave, Cicero	16-29-106-017-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	13839 LeClaire Ave, Crestwood	28-04-207-008-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	9736 Nashville, Oak Lawn	24-07-211-055-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	19809 Brook Ave., Lynwood	33-07-321-001-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	602 E 158th St, South Holland	29-15-203-026-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	2506 Lewis, Blue Island	24-25-419-032-0000	Mack Industries Ltd.
						August 2013 Commissi	9/20/2013	\$50.00	1001 Purdue Lane, Matteson	31-21-106-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	14504 University, Dolton	29-02-331-014-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	4400 W 152nd St, Midlothian	28-15-103-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	16224 Ellis Ave., South Holland	29-23-103-022-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	3547 Marseille, Hazel Crest	28-35-408-085-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	212 143rd, Dolton	29-03-319-019-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	331 Prairie Ave, Calumet City	29-12-110-052-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	4461 W 186th St, Country Club Hills	31-03-109-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	402 Oglesby Ave, Calumet City	29-12-218-025-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						August 2013 Commissi	9/20/2013	\$50.00	19041 Canterbury, Country Club Hills	31-04-412-008-0000	Mack Industries Ltd.
Bill Pmt	10/4/2013	64722	Shannon Pittacora 09/23 - 10/06	First Community Operating #6212	\$1,262.50	Shannon Pittacora	10/4/2013	\$1,262.50	Acquisitions Department		Consulting Fees
Bill Pmt	10/18/2013	64988	Shannon Pittacora 09/23 - 10/06	First Community Operating #6212	\$1,262.25	Shannon Pittacora	10/18/2013	\$1,262.25	Acquisitions Department		Consulting Fees
Bill Pmt	10/18/2013	65058		First Community Operating #6212	\$2,050.00	Sept. 2013 Comm.	10/14/2013	\$50.00	12427 S Lincoln St, Calumet City	25-30-407-052-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	18826 Queens Rd, Homewood	32-05-405-011-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	14340 Kenwood, Dolton	29-02-410-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	3037 Matthew Ln, Homewood	31-01-116-008-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	4932 Lakeshore, Richton Park	31-33-407-043-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	818 Princeton, Matteson	31-20-203-004-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	126 E Clark, Glenwood	32-03-322-033-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	19 N Elm, Glenwood	32-03-421-016-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	18310 Oakwood, Lansing	30-31-409-004-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	16940 Old Elm Drive, Country Club Hills	28-26-110-050-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	3664 Adams St, Lansing	30-32-202-040-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	4625 W 189th St, Country Club Hills	31-03-312-016-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	20306 Fairfield, Olympia Fields	31-14-401-018-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	21301 Jeffrey Dr, Matteson	31-23-321-001-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	616 Sullivan, University Park	21-14-13-204-034-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	17006 Central Park Ave, Hazel Crest	28-26-122-009-0000	Mack Investments I LLC
						Sept. 2013 Comm.	10/14/2013	\$50.00	15231 Sunset Drive, Dolton	29-11-428-008-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	12204 Lawndale, Alsip	24-26-102-062-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	18240 Grant St, Lansing	30-32-303-020-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	14535 Kedvale, Midlothian	28-10-220-008-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	10975 S Church St, Chicago	25-18-415-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	18400 Chicago, Lansing	30-31-419-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	15444 State St, South Holland	29-16-205-049-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	654 Forsythe, Calumet City	30-08-414-023-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	18107 Juneway Ct, Country Club Hills	28-34-407-046-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	1469 Wentworth, Calumet City	30-20-044-044-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	15031 Oak, Dolton	29-10-429-010-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	7220 W 73rd St, Bridgeview	18-25-210-017-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	17810 Princeton, Country Club Hills	28-35-118-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	1037 W Brockhurst, University Park	21-14-13-401-070 (Will)	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	18649 Chestnut, Country Club Hills	31-03-207-007-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	17010 Kedzie, Hazel Crest	28-26-201-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						Sept. 2013 Comm.	10/14/2013	\$50.00	2724 Lake Park Dr, Lynwood	33-07-101-039-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						Sept. 2013 Comm.	10/14/2013	\$50.00	955 E 161st St, South Holland	29-14-311-032-0000	Mack Investments I LLC
						Sept. 2013 Comm.	10/14/2013	\$50.00	9124 S Utica, Evergreen Park	24-01-302-024-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	226 E Maple, Glenwood	32-03-419-029-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						Sept. 2013 Comm.	10/14/2013	\$50.00	15980 Drexel, South Holland	29-14-306-021-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	16830 S Glen Oak Dr, Country Club Hills	28-26-107-047-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	130 Maryview Pkwy, Matteson	31-16-103-016-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	104 E Marion St, Thornton	29-27-312-021-0000	Mack Industries Ltd.
						Sept. 2013 Comm.	10/14/2013	\$50.00	737 E 160th St, South Holland	29-15-407-066-0000	Mack Industries Ltd.
Bill Pmt	11/1/2013	65285	Shannon Pittacora 10/21 - 11/3	First Community Operating #6212	\$1,229.25	Shannon Pittacora	11/1/2013	\$1,229.25	Acquisitions Department		Consulting Fees
Bill Pmt	11/15/2013	65593	October 2013	First Community Operating #6212	\$1,650.00	October 2013	11/12/2013	\$50.00	18045 Edwards, Country Club Hills	28-34-410-009-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	22600 Pleasant Dr, Richton Park	31-33-205-020-0000	Mack Investments I LLC
						October 2013	11/12/2013	\$50.00	490 Bensley, Calumet City	29-12-404-022-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	29 N Oak, Glenwood	32-03-329-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	335 Oakwood, Park Forest	31-36-414-018-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	17930 Rose Ave., Lansing	29-36-200-122-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	731 Old Farm, Matteson	31-17-323-020-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	623 E 162nd Place, South Holland	29-22-202-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	1020 E 153rd St, South Holland	29-11-323-020-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	3118 W 183rd St, Homewood	28-36-304-043-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	376 Luella, Calumet City	29-12-216-026-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	3661 178th St, Lansing	30-32-200-078-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	2932 188th Place, Lansing	33-06-208-007-0000	Mack Industries Ltd.
						October 2013	11/12/2013	\$50.00	17241 S Langley, South Holland	29-27-212-025-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	645 Saginaw, Calumet City	30-07-325-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	4924 Imperial Dr, Richton Park	31-33-205-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	548 Landau Rd, University Park	21-14-13-207-012 (Will)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	18812 Cypress Ave, Country Club Hills	31-03-417-003-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	3633 Austin Blvd, Cicero	16-32-408-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	4055 149th St, Midlothian	28-10-413-045-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	1205 Heather Rd, Homewood	32-05-119-028-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	15548 LeClaire, Oak Forest	28-16-400-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	22124 Kostner Ave, Richton Park	31-27-406-006-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	3846 W 217th St, Matteson	31-26-110-064-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	10235 S Charles, Chicago	25-08-307-028-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	17871 Anthony Ave, Country Club Hills	28-34-106-014-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	659 Paxton Ave, Calumet City	29-12-424-037-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	Unspecified		Unspecified
						October 2013	11/12/2013	\$50.00	5439 W 22nd Pl, Cicero	16-28-105-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	1243 King Ave, South Holland	29-14-212-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	624 Hickok Dr, University Park	21-14-13-101-024-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						October 2013	11/12/2013	\$50.00	14725 Memorial Dr, Dolton	29-10-236-025-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						October 2013	11/12/2013	\$50.00	18761 John Ave, Country Club Hills	31-03-307-009-0000	Mack Investments I LLC
Bill Pmt	11/15/2013	65639	Week Ending 10/27/13 and 11/17/13	First Community Operating #6212	\$1,297.13	Shannon Pittacora	11/15/2013	\$1,297.13	Acquisitions Department		Consulting Fees
Check	11/29/2013	65949	Office Expense	First Community Operating #6212	\$200.00	Shannon Pitacora	11/29/2013	\$1,254.00	Acquisitions Department		Consulting Fees
Bill Pmt	11/29/2013	66029	Shannon - 11/18 - 12/1	First Community Operating #6212	\$1,254.00	Shannon Pittacora	12/12/2013	\$1,221.00	Acquisitions Department		Consulting Fees
Bill Pmt	12/13/2013	66306	Shannon Pittacora W.E. 12/8 - 12/15	First Community Operating #6212	\$1,221.00	Shannon Pittacora	12/27/2013	\$1,237.50	Acquisitions Department		Consulting Fees
Bill Pmt	12/27/2013	66575	Shannon Pittacora W.E. 12/15 - 12/22	First Community Operating #6212	\$1,237.50	Shannon Pittacora					Consulting Fees
Bill Pmt	12/27/2013	66587	November 2013 Commissions	First Community Operating #6212	\$1,600.00	November 2013	12/19/2013	\$50.00	18232 Roy Ave, Lansing	30-32-301-023-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						November 2013	12/19/2013	\$50.00	16452 George Dr, Oak Forest	28-22-303-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	18900 Oakwood, Country Club Hills	31-03-410-043-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	17825 Oakley, Lansing	30-31-121-031-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	10115 Talman, Chicago	24-12-422-015-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	9721 California, Evergreen Park	24-12-215-009-0000	Mack Industries Ltd.
						November 2013	12/19/2013	\$50.00	1205 Evergreen Rd, Homewood	32-05-120-002-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	19920 Monterey Ave, Lynwood	33-07-309-022-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	18130 Oakwood, Lansing	30-31-221-035-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	4124 Indian Hill, Country Club Hills	28-27-409-041-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	17122 Central Pk Ave, Hazel Crest	28-26-301-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	13054 Honore, Blue Island	25-31-216-036-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	1387 Superior Ave, Calumet City	30-19-216-010-0000	Mack Industries Ltd.
						November 2013	12/19/2013	\$50.00	3801 216th Place, Matteson	31-26-110-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	18921 Willow Ave., Country Club Hills	31-03-405-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	17658 Lincoln Ave, Homewood	28-36-205-020-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	308 Clyde Ave, Calumet City	29-12-105-059-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	3423 Adams St, Lansing	30-32-111-039-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	108 N Princeton Ave, Villa Park	06-04-414-029 (Du Page)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	6020 Warwick Dr, Matteson	31-20-103-010-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	7423 W 56th Pl, Summit	18-13-211-007-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	22345 Ridgeway, Richton Park	31-35-102-017-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	705 E 163rd St, South Holland	29-22-204-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	2321 S 61st Ave, Cicero	16-29-114-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	1/10/2014	66826	Shannon Pittacora W.E. 1/5/14 - 1/12/14	First Community Operating #6212	\$1,320.00	November 2013	12/19/2013	\$50.00	1414 Memorial Dr, Calumet City	29-12-415-042-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	349 E Maple Dr, Glenwood	32-03-412-021-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	17710 Arlington Dr, Country Club Hills	28-35-107-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	1537 S 57th Ct, Cicero	16-20-229-019-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	508 Circle Dr, University Park	21-14-12-406-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	17770 Springfield Ave, Country Club Hills	28-35-103-080-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						November 2013	12/19/2013	\$50.00	1213 Clinton Ave, Berwyn	16-19-105-011-0000	Mack Industries Ltd.
Bill Pmt	1/24/2014	67134	December 2013	First Community Operating #6212	\$900.00	November 2013	12/19/2013	\$50.00	13724 Cedarbend, Homer Glen	16-05-10-208-009-0000 (Will)	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						Shannon Pittacora	1/10/2014	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	1/24/2014	67184	Shannon Pittacora W/E 01/12 and 01/19	First Community Operating #6212	\$1,266.38	December 2013	12/31/2013	\$50.00	17479 Eastgate Dr, Country Club Hills	28-27-403-011-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	903 Blackhawk Dr, University Park	21-14-13-211-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	3126 180th St, Lansing	30-31-213-018-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	18001 Olympia Dr, Country Club Hills	28-34-404-001-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	16142 Woodlawn West, South Holland	29-15-303-034-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	18024 Greenview Ter, Country Club Hills	28-34-410-018-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	15285 State St, South Holland	29-10-304-016-0000	Mack Investments II LLC
						December 2013	12/31/2013	\$50.00	3702 S 53rd, Cicero	16-33-319-026-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	649 Price, Calumet City	30-08-325-004-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	586 Calhoun, Calumet City	29-12-421-022-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						December 2013	12/31/2013	\$50.00	428 Buffalo Ave, Calumet City	30-07-214-035-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	16620 S Langley, South Holland	29-22-412-024-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	17044 Oakwood, Lansing	30-30-201-028-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	4541 Lindenwood Dr, Matteson	31-22-114-015-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	304 Clinton Ave, Oak Park	16-07-318-002-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	1333 Buffalo Ave, Calumet City	30-19-215-009-0000	Mack Industries Ltd.
						December 2013	12/31/2013	\$50.00	3730 W 60th Pl, Chicago	19-14-310-034-0000	Mack Industries Ltd.
Bill Pmt	1/24/2014	67184	Shannon Pittacora W/E 01/12 and 01/19	First Community Operating #6212	\$1,266.38	December 2013	12/31/2013	\$50.00	17148 Evans Ave, South Holland	29-26-105-004-0000	Mack Industries Ltd.
						Shannon Pittacora	1/24/2014	\$1,266.38	Acquisitions Department		Consulting Fees
Bill Pmt	2/7/2014	67453	Shannon Pittacora W/E 02/02 AND 02/09	First Community Operating #6212	\$1,291.13	Shannon Pittacora	2/7/2014	\$1,291.13	Acquisitions Department		Consulting Fees
						Shannon Pittacora	2/7/2014	\$1,291.13	Acquisitions Department		Consulting Fees
Bill Pmt	2/20/2014	67769	January 2014	First Community Operating #6212	\$1,300.00	January 2014	1/31/2014	\$50.00	832 Stonegate, New Lenox	15-08-22-310-037-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	17301 Burr Oak Lane, Hazel Crest	28-26-402-041-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2014	1/31/2014	\$50.00	2353 183rd Pl, Lansing	29-36-403-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2014	1/31/2014	\$50.00	17041 Ridgewood, Lansing	30-30-203-017-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2014	1/31/2014	\$50.00	619 Greenbay, Calumet City	30-07-423-021-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	16820 Oak Park Ave, Tinley Park	28-30-107-017-0000	Mack Industries Ltd.
						January 2014	1/31/2014	\$50.00	1720 W 99th, Chicago	25-07-217-059-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	17306 Central Park, Hazel Crest	28-26-412-005-0000	Chicago Title Land Trust dated Mar. 14, 2013, No. 8002361345
						January 2014	1/31/2014	\$50.00	2824 186th, Lansing	30-31-425-009-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2014	1/31/2014	\$50.00	1039 Brampton, University Park	21-14-13-407-009 (Will)	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	3760 178th Pl, Country Club Hills	28-35-108-030-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	4823 LaCrosse Ave, Chicago	19-09-215-007-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	17831 Princeton Ln, Country Club Hills	28-35-119-009-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	1855 S Ridgeland, Berwyn	16-20-316-001-0000	Mack Industries Ltd.
						January 2014	1/31/2014	\$50.00	51 S Willow Ln, Glenwood	32-03-403-013-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	6800 Centennial Dr, Tinley Park	28-19-100-051-0000	Mack Investments II LLC Series 6800 Centennial LLC
						January 2014	1/31/2014	\$50.00	18930 Loretto Ln, Country Club Hills	31-03-313-024-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	15400 Lisa Ct, Orland Park	27-14-109-036-0000	Mack Industries Ltd.
						January 2014	1/31/2014	\$50.00	9232 S 50th Ct, Oak Lawn	24-04-424-007-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	519 S Paxton Ave, Calumet City	29-12-400-047-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	2177 Indiana Ave, Lansing	29-36-209-009-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	1212 S 59th Ct, Cicero	16-20-200-020-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	3245 Cuyler, Berwyn	16-32-112-055-0000	Mack Industries Ltd.
						January 2014	1/31/2014	\$50.00	1519 Bates Ct, Schaumburg	07-29-413-013-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	18910 S Loretto Ln, Country Club Hills	31-03-313-022-0000	Mack Industries II LLC
						January 2014	1/31/2014	\$50.00	17620 Hillcrest Dr, Country Club Hills	28-35-112-022-0000	Mack Industries II LLC
Bill Pmt	2/21/2014	67746	Shannon Pittacora 2/26 - 2/23	First Community Operating #6212	\$1,130.25	Shannon Pittacora	2/19/2014	\$1,130.25	Acquisitions Department		Consulting Fees
						Shannon Pittacora	3/6/2014	\$1,146.75	Acquisitions Department		Consulting Fees
Bill Pmt	3/6/2014	68020	Shannon Pittacora 2/24 - 3/6	First Community Operating #6212	\$1,146.75	Shannon Pittacora	3/6/2014	\$1,146.75	Acquisitions Department		Consulting Fees
						Shannon Pittacora	3/6/2014	\$1,146.75	Acquisitions Department		Consulting Fees
Bill Pmt	3/21/2014	68299	February 2014	First Community Operating #6212	\$950.00	February 2014	2/28/2014	\$50.00	448 Hirsch, Calumet City	30-08-108-051-0000	Mack Industries Ltd.
						February 2014	2/28/2014	\$50.00	16454 Roy St, Oak Forest	28-22-306-050-0000	Wheelhouse Investments LLC
						February 2014	2/28/2014	\$50.00	335 E Mulberry Dr, Glenwood	32-03-414-003-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	3400 Seine Ct, Hazel Crest	28-35-408-043-0000	Wheelhouse Investments LLC
						February 2014	2/28/2014	\$50.00	1834 Terrace Rd, Homewood	32-06-400-052-0000	Wheelhouse Investments LLC
						February 2014	2/28/2014	\$50.00	813 Cambridge Ave, Matteson	31-21-110-025-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	538 Hickok Ave, University Park	21-14-13-214-011-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	16944 Old Elm Dr, Country Club Hills	28-26-110-049-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	17721 Arlington Dr, Country Club Hills	28-35-108-049-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	17820 Yale Lane, Country Club Hills	28-35-206-019-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	18013 Olympia, Country Club Hills	28-34-404-004-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	1322 S 58th Ave, Cicero	16-20-211-026-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	18206 Idlewild Dr, Country Club Hills	28-34-414-021-0000	Mack Industries II LLC

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						February 2014	2/28/2014	\$50.00	2612 W 89th Pl, Evergreen Park	24-01-208-027-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	537 Nathan Rd, University Park	21-14-13-218-004 (Will)	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	811 Greenbay Ave, Calumet City	30-18-228-008-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	231 Oakhurst, Matteson	31-17-209-041-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	17205 Longfellow Ave, Hazel Crest	28-25-311-003-0000	Mack Industries II LLC
						February 2014	2/28/2014	\$50.00	1365-67 S. River Dr, Calumet City	30-19-100-080-0000	Mack Investments I LLC, Series 1365-67 River Road
Bill Pmt	3/21/2014	68300	3/10/14-3/21/14	First Community Operating #6212	\$1,196.25						
						3/10/14-3/21/14	3/20/2014	\$1,196.25	Acquisitions Department		Consulting Fees
Bill Pmt	4/4/2014	68685	3/24/14 - 4/4/14	First Community Operating #6212	\$1,221.00						
						3/24/14 - 4/4/14	4/4/2014	\$1,221.00	Acquisitions Department		Consulting Fees
Bill Pmt	4/18/2014	68877	March 2014	First Community Operating #6212	\$700.00						
						March 2014	3/31/2014	\$50.00	8716 S Sacramento, Evergreen Park	24-01-117-043-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	117 W Rose St, Glenwood	32-03-315-026-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	824 Dartmouth Ave, Matteson	31-20-204-019-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	16448 Wausau, South Holland	29-22-107-023-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	4308 183rd St, Country Club Hills	28-34-421-040-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	3430 Maple Ln, Hazel Crest	28-26-403-012-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	17803 Oakwood, Hazel Crest	28-36-107-011-0000	Mack Industries Ltd.
						March 2014	3/31/2014	\$50.00	1007 Purdue Ln, Matteson	31-21-106-025-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	18537 Ashland Ave, Homewood	32-05-110-024-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	16342 Evans, South Holland	29-22-203-005-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	2717 Turtle Creek, Hazel Crest	28-36-222-003-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	724 Union, University Park	21-14-12-405-031	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	3434 218th St, Matteson	31-26-210-006-0000	Mack Industries II LLC
						March 2014	3/31/2014	\$50.00	15637 Orchid Dr, South Holland	29-15-213-002-0000	Mack industries II LLC
Bill Pmt	4/18/2014	68912	4/5/14 - 4/18/14	First Community Operating #6212	\$1,188.00						
						4/5/14 - 4/18/14	4/17/2014	\$1,188.00	Acquisitions Department		Consulting Fees
Bill Pmt	5/2/2014	69209	4/5/14 - 4/18/14	First Community Operating #6212	\$1,204.50						
						4/21/14 - 5/2/14	5/1/2014	\$1,204.50	Acquisitions Department		Consulting Fees
Bill Pmt	5/16/2014	69507		First Community Operating #6212	\$500.00						
						April 2014	4/30/2014	\$50.00	3214 W Charlemagne, Hazel Crest	28-35-408-024-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	1039 Abbott Ln, University Park	21-14-13-405-008 (Will)	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	4116 W 216th, Matteson	31-27-202-017-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	1728 Patricia Ln, Flossmoor	31-12-310-007-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	18823 Ashland, Homewood	32-05-310-004-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	2616 W 97thPl, Evergreen Park	24-12-216-053-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	16061 Prairie, South Holland	29-15-310-012-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	18621 Lexington Ave, Homewood	32-06-123-005-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	861 W 62nd St, LaGrange	18-17-412-002-0000	Mack Industries II LLC
						April 2014	4/30/2014	\$50.00	438 E 191st Place, Glenwood	32-10-206-002-0000	Mack industries II LLC
Bill Pmt	5/16/2014	69602	5/3/14 - 5/16/14	First Community Operating #6212	\$1,171.50						
						5/3/14 - 5/16/14	5/15/2014	\$1,171.50	Acquisitions Department		Consulting Fees
Bill Pmt	5/30/2014	69860	5/17/14 - 5/30/14	First Community Operating #6212	\$1,171.50						
						5/17/14 - 5/30/14	5/29/2014	\$1,171.50	Acquisitions Department		Consulting Fees
Bill Pmt	6/13/2014	70159	05/31/14 - 06/13/14	First Community Operating #6212	\$1,270.50						
						05/31/14 - 06/13/14	6/12/2014	\$1,270.50	Acquisitions Department		Consulting Fees
Bill Pmt	6/26/2014	70480		First Community Operating #6212	\$2,170.00						
						May 2014	6/20/2014	\$50.00	22457 Arquilla Dr, Richton Park	31-33-105-014-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	112 E 160th Place, South Holland	29-15-302-022-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	917 Cordoba Ct, University Park	21-14-13-107-003-0000 (Will)	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	3860 178th Pl, Country Club Hills	28-35-115-005-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	17810 Sarah Lane, Country Club Hills	28-35-117-019-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	1325 E. 168th Place, South Holland	29-23-404-010-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	1566 Vincennes, Crete	23-15-17-203-008-0000 (Will)	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	2408 207th St, Olympia Fields	31-24-200-012-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	848 Strieff Lane, Glenwood	32-04-102-008-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	1370 Selleck, Crete	23-15-09-326-007 (Will)	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	3443 N Plainfield, Chicago	12-23-411-003-0000	Mack industries II LLC
						May 2014	6/20/2014	\$50.00	17213 Springtide Ln, Hazel Crest	28-26-310-017-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	3304 Calwagner St, Franklin Park	12-21-414-033-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	17152 Cornell Ave, South Holland	29-26-206-020-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	3858 Holly Court, Country Club Hills	28-26-307-015-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	5425 LaPlam Dr, Oak Forest	28-09-311-010-0000	Mack Industries II LLC
						May 2014	6/20/2014	\$50.00	17925 Walter St, Lansing	30-32-108-037-0000	Mack Industries II LLC
						6/16/14-6/22/14	6/25/2014	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	7/11/2014	70690		First Community Operating #6212	\$1,320.00						
						06/30/14 - 7/11/14	7/10/2014	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	7/25/2014	71027	June 2014	First Community Operating #6212	\$1,200.00						
						June 2014	6/30/2014	\$50.00	17927 Lorenz Ave, Lansing	30-31-213-006-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	17541 Greenbay, Lansing	30-30-411-051-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	3732 153rd St, Midlothian	28-14-105-003-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	7644 W 66th St, Bedford Park	18-24-112-013-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	17303 Roy St, Lansing	30-29-112-041-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	1225 Cleveland St, Lockport	11-04-24-312-013 (Will)	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	6023 Aspen, Matteson	31-17-313-007-0000	Mack industries II LLC
						June 2014	6/30/2014	\$50.00	8453 S. Kenneth, Chicago	19-34-304-059-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	4726 Patterson, Chicago	13-22-121-034-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	2033 N Lawler, Chicago	13-33-226-009-0000	Mack Industries II LLC

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	7/25/2014	71081		First Community Operating #6212	\$1,320.00	June 2014	6/30/2014	\$50.00	15820 Chicago Rd, South Holland	29-15-108-027-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	3260 203rd St, Lynwood	33-17-103-011-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	7120 Christiana Ave, Chicago	19-26-204-028-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	17948 Wentworth, Lansing	30-32-114-028-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	7975 S. Latrobe, Burbank	19-33-109-011-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	15065 Maryland Ave, South Holland	29-11-301-044-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	3610 W 61st, Chicago	19-14-315-039-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	17720 Central Pk, Country Club Hills	28-35-113-011-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	995 Summerhill Dr, Aurora	14-25-428-007 (Kane)	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	17621 Grandview, Hazel Crest	28-36-104-028-0000	Mack Industries Ltd.
						June 2014	6/30/2014	\$50.00	6615 S Richmond, Chicago	19-24-129-006-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	3740 N Page, Chicago	12-23-222-023-0000	Mack Industries II LLC
						June 2014	6/30/2014	\$50.00	3740 176th St, Country Club Hills	28-35-103-030-0000	Mack Industries Ltd.
						June 2014	6/30/2014	\$50.00	15425 S Park Ave, South Holland	29-15-105-012-0000	Mack Industries Ltd.
Bill Pmt	8/8/2014	71411	7/28/14 - 8/8/14	First Community Operating #6212	\$1,922.40	7/14/14 - 7/25/14	7/24/2014	\$1,320.00	Acquisitions Department		Consulting Fees
Bill Pmt	8/22/2014	71686	July 2014	First Community Operating #6212	\$1,450.00	7/28/14 - 8/8/14	8/7/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	8/22/2014	71751	8/11/14 - 8/24/14	First Community Operating #6212	\$1,922.40	July 2014	7/31/2014	\$50.00	213 S Elmhurst, Mount Prospect	08-12-117-007-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	4325 W 83rd St, Chicago	19-34-401-040-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	147 E Maple Dr, Glenwood	32-03-330-010-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	14506 Spaulding, Midlothian	28-11-220-014-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	3740 Highland, Country Club Hills	28-35-105-018-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	1510 Highland Ave, Elgin	06-15-131-015 (Kane)	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	17701 Devon, Country Club Hills	28-35-107-031-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	1223 Emerald, Chicago Heights	32-21-109-009-0000	Mack Industries Ltd.
						July 2014	7/31/2014	\$50.00	844 Terrace Dr, Glenwood	32-04-104-009-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	727 S Finley Rd, Lombard	06-18-103-006	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	4748 176th St, Country Club Hills	28-34-107-036-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	107 Pine Ln, Glenwood	32-03-420-020-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	17784 Springfield, Country Club Hills	28-35-103-082-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	21123 Oak St, Matteson	31-23-401-005-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	431 Hugo Ct, Villa Park	06-04-109-004-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	9018 Walnut N, Tinley Park	27-27-414-017-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	1001 Center St, Geneva	12-03-105-015 (Kane)	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	17850 Yale Ln, Country Club Hills	28-35-206-016-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	1182 Lyman Ave, Oak Park	16-17-330-013-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						July 2014	7/31/2014	\$50.00	17543 Roy, Lansing	30-29-309-047-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	17912 Commercial, Lansing	30-31-109-033-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	151 Stanton Dr, Bartlett	6-32-304-019-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	21 Sycamore Ln, Glenwood	32-03-416-004-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	9900 S. Winchester, Chicago	25-07-400-012-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	3406 W. 74th St., Chicago	19-26-220-035-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	17848 Roy St, Lansing	30-32-101-031-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	6820 Maplewood, Chicago	19-24-409-025-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	16941 Glen Oaks Dr, Country Club Hills	28-26-120-026-0000	Mack Industries II LLC
						July 2014	7/31/2014	\$50.00	15450 Maple St, South Holland	29-15-205-044-0000	Mack Industries II LLC
Bill Pmt	9/5/2014	72053	8/23/14 - 9/5/14	First Community Operating #6212	\$1,922.40	8/11/14 - 8/24/14	8/21/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	9/19/2014	72302	August 2014	First Community Operating #6212	\$1,550.00	8/23/14 - 9/5/14	9/4/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	8/31/2014					August 2014	8/31/2014	\$50.00	1045 Samson Dr, University Park	21-14-13-408-010 (Will)	Mack Industries Ltd.
						August 2014	8/31/2014	\$50.00	3728 214th Pl, Matteson	31-23-307-012-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	1121 Olive Rd, Homewood	29-32-404-058-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	2104 Vardon, Flossmoor	32-06-314-007-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	1432 S 58th Ave, Cicero	16-20-219-031-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	5655 Crestwood, Matteson	31-17-212-037-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	5152 Arquilla, Richton Park	31-33-208-011-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	121 Villa St., Elgin	06-13-311-004 (Kane)	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	9847 Prospect Ave, Chicago	25-07-219-026-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	1909 Highland, Berwyn	16-20-323-004-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	657 W Exchange, Crete	23-15-08-419-010 (Will)	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	223 20th Ct., Lockport	11-04-26-119-004 (Will)	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	15640 Lamont, Oak Forest	28-16-406-024-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	15445 S. Cherry St., South Holland	29-15-207-010-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	5006 Wolfram St, Chicago	13-28-225-036-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	1002 E. 153rd, South Holland	29-11-325-030-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	5133 W 22nd Pl, Cicero	16-28-204-007-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	1630 Mannheim, Westchester	15-20-408-034-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	4508 Camden Ct, Richton Park	31-27-312-012-0000	Mack Industries Ltd.
						August 2014	8/31/2014	\$50.00	17300 Highland Ct., Hazel Crest	28-25-407-014-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	16907 Forest View, Tinley	28-30-214-018-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	823 Singer Ave, Lemont	22-29-116-006-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	3414 186th St., Lansing	30-32-327-031-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	344 Gehrig Circle, Bolingbrook	12-02-10-105-016-0000 (Will)	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	17314 Henry, Lansing	30-29-113-052-0000	Mack Industries II LLC

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						August 2014	8/31/2014	\$50.00	15956 Debra Dr, Oak Forest	28-21-118-022-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	18610 Morris, Homewood	32-06-123-016-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	2516 1st Ave, North Riverside	15-26-131-013-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	2652 Woodworth, Hazel Crest	28-25-405-021-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	5125 W. 101st St, Oak Lawn	24-09-411-005-0000	Mack Industries II LLC
						August 2014	8/31/2014	\$50.00	561 Merrill, Calumet City	29-12-314-009-0000	Mack Industries II LLC
Bill Pmt	9/19/2014	72447	09/06/14 - 09/19/14	First Community Operating #6212	\$1,922.40						
						09/06/14 - 09/19/14	9/19/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/3/2014	72736	09/22/14 - 10/3/14	First Community Operating #6212	\$1,922.40						
						09/22/14 - 10/3/14	10/2/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/17/2014	73019	September 2014	First Community Operating #6212	\$1,450.00						
						September 2014	9/30/2014	\$50.00	2657 171st St., Hazel Crest	28-25-403-041-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	531 Hickok, University Park	21-14-13-217-016	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	3209 Woodworth Pl, Hazel Crest	28-26-410-011-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	17936 Burnham, Lansing	30-31-213-022-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	820 Blackhawk Dr, University park	21-14-13-204-005 (Will)	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	2504 W 83rd St., Chicago	19-36-229-042-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	1230 156th St, South Holland	29-14-212-026-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	17011 Central Park, Hazel Crest	28-26-123-016-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	7848 W 80th Pl, Bridgeview	18-36-118-035-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	4130 188th St, Country Club Hills	31-03-419-002-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	4200 Arlington Dr., Richton Park	31-27-409-001-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	715 Circle Dr, University Park	21-14-12-406-008	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	20501 Hellenic Dr., Olympia Fields	31-14-409-001-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	746 E. 157th St., South Holland	29-15-218-016-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	17525 Lorenz, Lansing	30-30-410-046-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	2427 Oak Park Ave, Berwyn	16-30-216-009-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	5235 Diane, Oak Forest	28-16-101-064-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	16 N Elm, Glenwood	32-03-419-021-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	10822 Church, Chicago	25-17-300-035-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	2734 N. Neva, Chicago	13-30-300-032-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	547 Regent, University Park	21-14-13-214-003	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	19808 Lakewood Ave, Lynwood	33-07-308-027-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	18331 Hickory, Lansing	29-36-404-014-0000	Mack Industries Ltd.
						September 2014	9/30/2014	\$50.00	231 Tulip Dr., Glenwood	32-03-419-004-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	2917 N. Nordica, Chicago	13-30-137-012-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	6437 26th St., Berwyn	16-30-230-036-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	22647 Ridgeway, Richton Park	31-35-114-034-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	22554 Pleasant Dr., Richton Park	31-33-205-022-0000	Mack Industries II LLC
						September 2014	9/30/2014	\$50.00	2742 W 97th Pl, Evergreen Park	24-12-215-028-0000	Mack Industries II LLC
Bill Pmt	10/17/2014	73079	10/6/14 - 10/17/14	First Community Operating #6212	\$1,922.40						
						10/6/14 - 10/17/14	10/16/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/31/2014	73343	10/20/14 - 10/31/14	First Community Operating #6212	\$1,922.40						
						10/20/14 - 10/31/14	10/29/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	11/14/2014	73672	11/1/2014 - 11/14/20	First Community Operating #6212	\$1,922.40						
						11/1/2014 - 11/14/20	11/12/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Check	11/28/2014	74040	Office Expense	First Community Operating #6212	\$200.00						
Bill Pmt	11/28/2014	74004	October 2014	First Community Operating #6212	\$1,350.00						
						October 2014	10/31/2014	\$50.00	3111 Scott St., Franklin Park	12-28-200-083-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	1231 Austin Blvd, Cicero	16-20-200-016-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	17508 Greenbay, Lansing	30-30-410-053-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	3468 N. Schultz, Lansing	30-32-315-020-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	15 S Maple, Prospect Heights	3-27-204-005-0000	Wheelhouse Investments LLC
						October 2014	10/31/2014	\$50.00	1358 W 109th Pl, Chicago	25-17-319-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						October 2014	10/31/2014	\$50.00	1061 Grandview, Lockport	11-04-24-311-008 (Will)	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	15500 Chicago Rd, South Holland	29-15-106-024-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						October 2014	10/31/2014	\$50.00	16719 Butterfield, Country Club Hills	28-26-106-028-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						October 2014	10/31/2014	\$50.00	609 Lily Ct., Schaumburg	07-27-103-003-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	3722 W. 171st St., Country Club Hills	28-26-306-009-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	1212 King Dr, South Holland	29-14-213-006-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	657 E. 159th Ct, South Holland	29-15-412-028-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	1244 Heather Hill, Flossmoor	31-12-114-017-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	110 Amboy Ln, Schaumburg	07-20-216-015-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	2332 Cuyler, Berwyn	16-29-108-035-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	851 Columbian Ave, Oak Park	16-06-402-014-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	5143 Aldersyde Rd, Oak Forest	28-28-206-021-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	552 Irving Pl, University Park	21-14-13-217-021 (Will)	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	22815 Richton Square Rd, Richton Park	31-35-305-009-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	234 S. Michigan Ave, Villa Park	06-09-208-043 (DuPage)	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	4161 188th St., Country Club Hills	31-03-416-002-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	3129 W 114th, Merrionette Park	24-24-116-005-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	16387 Terry Ln, Oak Forest	28-22-303-037-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	1633 S. 58th Ct., Cicero	16-20-403-021-0000	Deutsche Bank
						October 2014	10/31/2014	\$50.00	3316 Birchwood Dr, Hazel Crest	28-26-205-018-0000	Mack Industries II LLC
						October 2014	10/31/2014	\$50.00	3210 Woodworth, Hazel Crest	28-26-408-053-0000	Mack Industries II LLC
Bill Pmt	11/28/2014	74110	11/17/14 - 11/28/14	First Community Operating #6212	\$1,922.40						
						11/15/14 - 11/28/14	11/24/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	12/12/2014	74521	11/29/14 - 12/12/14	First Community Operating #6212	\$1,922.40						

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	12/26/2014	74839	November 2014	First Community Operating #6212	\$1,250.00	11/29/14 - 12/12/14	12/11/2014	\$1,922.40	Acquisitions Department		Consulting Fees
						November 2014	11/30/2014	\$50.00	7336 S California, Chicago	19-25-123-082-0000	Veterans Affairs / Ocwen Loan Servicing
						November 2014	11/30/2014	\$50.00	17303 Bryant Ln, Hazel Crest	28-25-318-007-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	3791 176th Place, Chicago	28-35-105-006-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	3254 N. Olcott, Chicago	12-24-425-030-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	616 E. Palatine Rd, Palatine	02-14-411-018-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	1423 Hartmann, Schaumburg	07-29-411-009-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	506 Landau, University Park	21-14-13-207-029-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	17416 Community, Lansing	30-29-302-043-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	4650 Farmington Ave, Richton Park	31-34-102-027-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	1722 168th St, Hazel Crest	29-30-206-015-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	18760 Loretto Ln, Country Club Hills	31-03-305-011-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	751 E. 164th Pl, South Holland	29-22-213-029-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	914 E. 167th St., South Holland	29-23-303-005-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	4136 175th Pl, Country Club Hills	28-34-214-003-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	20073 Terrace, Lynwood	33-07-305-003-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	20318 Fairfield, Olympia Fields	31-14-401-012-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	714 Circle, University Park	21-14-12-405-026	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	21611 Main St., Matteson	31-26-202-003-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	2711 Larkspur Ln, Hazel Crest	28-36-223-009-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	1643 S 57th Ct, Cicero	16-20-405-018-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	23 Sycamore, Glenwood	32-03-407-012-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	738 May St, Calumet City	30-18-217-051-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	7324 S Oak Grove, Justice	18-27-202-028-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	35 Oakview Rd, Matteson	31-17-206-018-0000	Mack Industries II LLC
						November 2014	11/30/2014	\$50.00	1445 Linden Rd, Homewood	29-32-304-062-0000	Mack Industries II LLC
Bill Pmt	12/26/2014	74898	12/15/14 - 12/28/14	First Community Operating #6212	\$1,922.40	12/15/14 - 12/28/14	12/23/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	1/9/2015	75010	12/29/14 - 1/9/15	First Community Operating #6212	\$1,922.40	12/29/14 - 1/9/15	12/30/2014	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	1/23/2015	75476		First Community Operating #6212	\$1,700.00						
						December 2014	12/31/2014	\$50.00	236 Traver, Glen Ellyn	05-15-128-031 (DuPage)	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	17422 Community, Lansing	30-29-302-045-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	22930 Bruce, Richton Park	31-33-404-044-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	16509 Craig Dr, Oak Forest	28-22-316-016-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	658 Mackinaw, Calumet City	30-07-430-035-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	18018 Wentworth, Lansing	30-32-119-060-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	2648 W 90th St, Evergreen Park	24-01-215-016-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	2852 189th St, Lansing	33-06-209-031-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	3408 Birchwood Dr, Hazel Crest	28-26-205-021-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	219 E. Rose St, Glenwood	32-03-409-012-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	16931 Glen Oaks, Country Club Hills	28-26-120-031-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	17923 Community, Lansing	30-32-110-006-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	430 Bruce Rd, Lockport	11-04-35-114-004-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	807 E 191st Pl, Glenwood	32-11-104-008-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	3861 217th St, Matteson	31-26-113-038-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	2118 W.119th St, Chicago	25-19-319-052-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	1615 Broadway, Crest Hill	11-04-33-411-016-0000 (Will)	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	17053 Grant St, Lansing	30-29-125-008-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	11510 Joalyce Dr, Alsip	24-22-300-010-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	9020 85th Ct, Hickory Hills	23-02-102-027-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	7513 W. 58th Pl, Summit	18-13-227-013-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	17908 Hickory St, Lansing	29-36-201-121-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	22111 Karlov, Richton Park	31-27-405-003-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	15542 Chicago Rd, South Holland	29-15-106-031-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	1218 174th St, East Hazel Crest	29-29-311-022-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	2441 178th St, Lansing	30-31-101-002-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	16924 Old Elm Dr, Country Club Hills	28-26-110-054-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	2745 179th St, Lansing	30-31-110-048-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	17725 Maple Ave, Country Club Hills	28-34-210-002-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	3438 Lake St, Lansing	30-32-122-037-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	21209 Oak St, Matteson	31-23-401-020-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	22111 Millard, Richton Park	31-26-310-003-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	11437 Longwood, Chicago	25-19-114-018-0000	Mack Industries II LLC
						December 2014	12/31/2014	\$50.00	119 W. Rose, Glenwood	32-03-315-025-0000	Mack Industries II LLC
Bill Pmt	1/23/2015	75564	1/12/15 - 1/22/15	First Community Operating #6212	\$1,922.40	1/12/15 - 1/22/15	1/22/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	2/6/2015	75887	1/26/15 - 2/6/15	First Community Operating #6212	\$1,922.40	1/26/15 - 2/6/15	2/5/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	2/20/2015	76121	January 2015	First Community Operating #6212	\$1,400.00						
						January 2015	1/31/2015	\$50.00	19535 Sycamore St, Mokena	19-09-10-317-011-0000 (Will)	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	19000 Keeler, Country Club Hills	31-03-406-012-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	6322 W 99th St, Oak Lawn	24-08-124-029-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	22157 Belmont Rd, Richton Park	31-27-307-025-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	20073 Lakewood, Lynwood	33-07-313-003-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2015	1/31/2015	\$50.00	18760 Cedar, Country Club Hills	31-03-413-007-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	4948 160th St, Oak Forest	28-21-202-006-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						January 2015	1/31/2015	\$50.00	6041 Mason Ave, Chicago	19-17-409-014-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	15430 Elm, South Holland	29-15-204-022-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						January 2015	1/31/2015	\$50.00	12520 S. Trumbull, Alsip	24-26-401-033-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	3408 218th St, Matteson	31-26-210-012-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	3415 Schultz Dr, Lansing	30-32-327-012-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	2301 Mayfair, Westchester	15-29-216-001-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	606 E. 164th Pl, South Holland	29-22-203-033-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	15 Joe Orr Ct, Crete	23-15-09-318-019 (Will)	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	811 Blackhawk Dr, University Park	21-14-13-205-003-0000 (Will)	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	4058 Indian Hill, Country Club Hills	28-27-409-035-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	313 E Center, Glenwood	32-03-415-012-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	3729 W. 121st Pl, Alsip	24-26-117-008-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	3608 175th Pl, Country Club Hills	28-35-109-012-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	2233 74th Ave, Elmwood Park	12-36-212-004-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	4207 Greenbrier, Richton Park	31-27-411-017-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	3650 177th Pl, Lansing	30-29-402-050-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	15422 S. Park Ave, South Holland	29-15-105-025-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	511 Buffalo Ave, Calumet City	30-07-405-017-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	22016 Millard, Richton Park	31-26-307-013-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	665 E. 160th, South Holland	29-15-412-050-0000	Mack Industries II LLC
						January 2015	1/31/2015	\$50.00	4853 W. 93rd St, Oak Lawn	24-04-427-007-0000	Mack Industries II LLC
Bill Pmt	2/20/2015	76194	2/9/15 - 2/20/15	First Community Operating #6212	\$1,922.40						
						2/9/15 - 2/20/15	2/19/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	3/6/2015	76506	2/23/15 - 3/6/15	First Community Operating #6212	\$1,922.40						
						2/23/15 - 3/6/15	3/6/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	3/20/2015	76663	February 2015	First Community Operating #6212	\$900.00						
						February 2015	2/28/2015	\$50.00	17690 Arlington Dr, Country Club Hills	28-35-107-003-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	4241 176th St, Country Club Hills	28-34-207-008-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	20440 Hellenic Dr, Olympia Fields	31-14-404-019-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						February 2015	2/28/2015	\$50.00	19724 Orchard, Lynwood	33-07-104-044-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						February 2015	2/28/2015	\$50.00	2547 W. 118th St, Chicago	24-24-416-004-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	18062 Exchange, Lansing	30-31-115-070-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						February 2015	2/28/2015	\$50.00	4904 Mission, Richton Park	31-33-204-033-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	4232 188th Pl, Country Club Hills	31-03-414-015-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	938 Notre Dame, Matteson	31-21-106-037-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	25728 S. Nancy St, Crete	23-15-22-205-015-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	46 Oakhurst, Matteson	31-17-208-006-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	17731 Yale Ln, Country Club Hills	28-35-207-004-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	490 Buffalo Ave, Calumet City	30-07-404-023-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	18034 Lorenz Ave, Lansing	30-31-219-037-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	17613 Grandview, Hazel Crest	28-36-104-024-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	17840 Princeton, Country Club Hills	28-35-118-010-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	17110 California, Hazel Crest	28-25-305-018-0000	Mack Industries II LLC
						February 2015	2/28/2015	\$50.00	614 Paxton Ave, Calumet City	29-12-318-048-0000	Mack Industries II LLC
Bill Pmt	3/20/2015	76795	3/9/15 - 3/20/15	First Community Operating #6212	\$1,922.40						
						3/9/15 - 3/20/15	3/19/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	4/3/2015	76956	3/23/15 - 4/3/15	First Community Operating #6212	\$1,922.40						
						3/23/15 - 4/3/15	4/1/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	4/17/2015	77189	March 2015	First Community Operating #6212	\$1,150.00						
						March 2015	3/31/2015	\$50.00	1364 E. 156th St, South Holland	29-14-215-019-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	18309 Ridgewood, Lansing	30-31-411-002-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	3009 Longfellow Ave, Hazel Crest	28-25-321-011-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	470 E. 161st St, South Holland	29-15-402-045-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	626 Sullivan, University Park	21-14-13-204-029-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	1013 Washington, Lockport	11-04-23-334-011 (Will)	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	6800 Indiana, Chicago	20-22-308-016-000	Mack Industries IV LLC
						March 2015	3/31/2015	\$50.00	3754 W 116th, Alsip	24-23-310-032-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	924 Cordoba, University Park	21-14-13-106-002-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	17225 S. Coventry, Country Club Hills	28-27-409-052-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	105 S. Spruce, Glenwood	32-03-404-024-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	22140 Main St, Richton Park	31-26-310-018-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	9540 McVicker, Oak Lawn	24-08-106-042-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	1043 Abbot Ln, University Park	21-14-13-405-010 (Will)	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	3124 Laramie Ave, Cicero	16-33-107-029-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	1584 E. Ave, Crete	23-15-16-124-027 (Will)	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	17942 Lorenz, Lansing	30-31-212-041-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	9800 Washtenaw, Evergreen Park	24-12-223-024-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	4521 189th St, Country Club Hills	31-03-315-017-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	50 S. Willow, Glenwood	32-03-402-012-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	11321 Whipple, Merriion	24-24-119-004-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	22802 E. Drive, Richton Park	31-33-404-005-0000	Mack Industries II LLC
						March 2015	3/31/2015	\$50.00	2728 S. 60th, Cicero	16-29-314-023-0000	Mack Industries II LLC
Bill Pmt	4/17/2015	77261	4/6/15 - 4/17/15	First Community Operating #6212	\$1,922.40						
						4/6/15 - 4/17/15	4/16/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	5/1/2015	77514	4/20/15 - 5/1/15	First Community Operating #6212	\$1,922.40						
						4/20/15 - 5/1/15	4/30/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	5/15/2015	77686	5/2/15 - 5/15/15	First Community Operating #6212	\$1,922.40						

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	5/15/2015	77689		First Community Operating #6212	\$1,150.00	5/2/15 - 5/15/15	5/14/2015	\$1,922.40	Acquisitions Department		Consulting Fees
						April 2015	4/30/2015	\$50.00	111 N. Walnut, Glenwood	32-03-413-015-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	17633 Wright St, Lansing	30-29-326-039-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	22928 E. Drive, Richton Park	31-33-407-004-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	17535 Highland Ave, Tinley Park	28-32-101-008-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	18058 Edwards, Country Club Hills	28-34-409-024-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	15031 Sunset Ave, Oak Forest	28-09-309-005-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	4725 176th St, Country Club Hills	28-34-108-022-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	2538 Silver Creek, Franklin Park	12-28-416-044-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	317 E. Hirsch, Northlake	15-05-226-017-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	666 E. 156th Pl, South Holland	29-15-221-017-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	431 E. 161st St, South Holland	29-15-403-045-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	18139 Tarpon, Homewood	28-36-313-010-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	3322 Montmartre, Hazel Crest	28-35-407-011-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	216 E. Maple, Glenwood	32-03-419-027-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	1474 Vista, Crete	23-15-16-112-007 (Will)	Mack Industries Ltd.
						April 2015	4/30/2015	\$50.00	17401 Holmes Ave, Hazel Crest	28-25-322-006-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	17641 Winston Dr, Country Club Hills	28-35-103-007-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	17305 Bryant Ln, Hazel Crest	28-25-318-008-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	7915 Jeffery, Chicago	20-36-200-012-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	8004 S. Yates, Chicago	20-36-215-020-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	17851 Springfield, Country Club Hills	28-35-115-015-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	19805 Crescent, Lynwood	33-07-320-001-0000	Mack Industries II LLC
						April 2015	4/30/2015	\$50.00	2617 W. 89th St, Evergreen Park	24-01-208-012-0000	Mack Industries II LLC
Bill Pmt	5/29/2015	78002	5/18/15 - 5/29/15	First Community Operating #6212	\$1,922.40	5/18/15 - 5/29/15	5/28/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	6/12/2015	78244	6/1/15 - 6/12/15	First Community Operating #6212	\$1,922.40	6/1/15 - 6/12/15	6/11/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	6/26/2015	78401	May 2015	First Community Operating #6212	\$1,300.00						
						May 2015	5/31/2015	\$50.00	906 Blackhawk, University Park	21-14-13-204-011	US Bank
						May 2015	5/31/2015	\$50.00	5217 Arquilla, Richton Park	31-33-104-027-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	3064 Olive, Homewood	28-36-303-038-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	14813 S. Homan, Midlothian	28-11-408-084-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	8434 Colfax, Chicago	21-31-311-035-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	22542 Lakeshore Dr, Richton Park	31-33-203-021-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	2615 W 97th Pl, Evergreen Park	24-12-218-015-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	8140 Coles St, Chicago	21-31-222-034-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	8154 S. Coles, Chicago	21-31-222-044-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	130 N. Oak Ln., Glenwood	32-03-331-004-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	4624 W.189th St, Country Club Hills	31-03-309-016-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	3431 Lake St, Lansing	30-32-124-008-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	15667 Rose Dr, South Holland	29-15-214-037-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	16925 Briargate, Country Club Hills	28-26-119-005-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	15755 Madison Ave, Dolton	29-13-105-012-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	2944 W. 97th Pl, Evergreen Park	24-12-118-023-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	17921 Normandy, Hazel Crest	28-35-405-024-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	20055 Terrace Ave, Lynwood	33-07-305-006-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	4341 190th Pl, Country Club Hills	31-03-401-002-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	532 Landau, University Park	21-14-13-207-016 (Will)	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	101 E. Maple Dr, Glenwood	32-03-330-001-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	3690 School Dr, Country Club Hills	28-35-118-001-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	17841 Exchange, Lansing	30-31-106-047-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	928 Beloit, Forest Park	15-13-410-012-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	3546 218th St, Matteson	31-26-209-002-0000	Mack Industries II LLC
						May 2015	5/31/2015	\$50.00	234 E. Maple, Glenwood	32-03-419-031-0000	Mack Industries II LLC
Bill Pmt	6/26/2015	78422	6/13/15 - 6/26/15	First Community Operating #6212	\$1,922.40	6/13/15 - 6/26/15	6/26/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	6/30/2015	78910	June 2015	First Community Operating #6212	\$1,000.00						
						June 2015	7/24/2015	\$50.00	1800 Cora St, Crest Hill	11-04-33-404-012	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	8741 Francisco, Evergreen Park	24-01-107-012-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	8539 S. Kingston, Chicago	21-31-319-015-0000	Mack Investments I LLC
						June 2015	7/24/2015	\$50.00	4173 188th St, Country Club Hills	31-03-416-001-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	16001 Avalon Ave, South Holland	29-14-405-012-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	7412 170th St, Tinley Park	27-25-210-023-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						June 2015	7/24/2015	\$50.00	17108 Longfellow, Hazel Crest	28-25-303-018-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	18461 Dundee, Homewood	31-01-209-025-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	1265 Arthur St, Calumet City	30-19-221-013-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	10 N. Willow, Glenwood	32-03-406-001-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	8418 Kingston Ave, Chicago	21-31-310-025-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	17632 Community, Lansing	30-29-315-054-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	7801 Narragansett, Burbank	19-29-308-001-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	17612 Willow Ave, Country Club Hills	28-34-207-010-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	22005 Balmoral, Richton Park	31-27-312-010-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	3313 178th St, Lansing	30-32-102-036-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	25050 Whispering Oaks, Crete	23-16-18-208-026-0000	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	1224 Harvest, University Park	21-14-13-416-020 (Will)	Mack Industries II LLC
						June 2015	7/24/2015	\$50.00	15515 Ellis Ave, Dolton	29-14-140-005-0000	Mack Industries II LLC

Ex. A - Transfers

Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	7/10/2015	78675	6/27/15 - 7/10/15	First Community Operating #6212	\$1,922.40	June 2015	7/24/2015	\$50.00	17060 Wausau Ave, South Holland	29-27-106-013-0000	Mack Industries II LLC
Bill Pmt	7/24/2015	78930	7/11/15 - 7/24/15	First Community Operating #6212	\$1,922.40	6/27/15 - 7/10/15	7/10/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	7/31/2015	79394	July 2015	First Community Operating #6212	\$1,400.00	7/11/15 - 7/24/15	7/24/2015	\$1,922.40	Acquisitions Department		Consulting Fees
						July 2015	7/31/2015	\$50.00	2624 Lombard Ave, Berwyn	16-29-303-031-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	162 Morse Dr, Northlake	15-05-107-031-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	22243 Karlov, Richton Park	31-27-405-019-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	17651 Pheasant Ln, Country Club Hills	28-35-112-006-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	7209 Roberts Rd, Bridgeview	18-25-102-034-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	732 Strieff Ln, Glenwood	32-04-102-024-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	6619 S. Ellis, Chicago	20-23-124-006-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	17841 Princeton, Country Club Hills	28-35-119-027-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	115 Monticello, Bolingbrook	12-02-10-401-080 (Will)	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	840 W. Manor Ct, Glenwood	32-04-113-001-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	7946 S. Merrill, Chicago	20-36-202-030-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	2029 N. Kenneth Ave, Chicago	13-34-129-011-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	1120 Abbot Ln, University Park	21-14-13-401-053 (Will)	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	1416 Ridge Rd, Homewood	29-32-304-036-0000	Chicago Title Land Trust dated Apr. 9, 2013, No. 8002361677
						July 2015	7/31/2015	\$50.00	730 E. 157th Pl, South Holland	29-15-219-014-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	4302 Applewood Ln, Matteson	31-22-204-008-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	1416 S. 51st Ct, Cicero	16-21-216-030-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	4516 W. 124th St, Alsip	24-27-306-034-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	1240 Hickory Rd, Homewood	29-32-307-036-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	4225 Clark Dr, Richton Park	31-27-409-013-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	633 160th Ct, South Holland	29-15-412-054-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	7746 S. Kingston Ave, Chicago	21-30-320-027-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	17790 Arlington, Country Club Hills	28-35-107-015-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	345 Frederick, Bellwood	15-09-301-010-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	3341 178th St, Lansing	30-32-103-005-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	4409 Home Ave, Stickney	19-06-311-028-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	1512 Fairview Ave, Park Ridge	12-02-220-016-0000	Mack Industries II LLC
						July 2015	7/31/2015	\$50.00	15360 Drexel, South Holland	29-11-319-008-0000	Mack Industries II LLC
Bill Pmt	8/7/2015	79227	7/25/15 - 8/7/15	First Community Operating #6212	\$1,922.40	7/25/15 - 8/7/15	8/7/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	8/21/2015	79510	8/8/15 - 8/21/15	First Community Operating #6212	\$1,922.40	8/8/15 - 8/21/15	8/21/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	9/4/2015	79764	8/22/15 - 8/30/15	First Community Operating #6212	\$1,922.40	8/22/15 - 8/30/15	9/4/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	9/18/2015	79919	August 2015	First Community Operating #6212	\$1,600.00						
						August 2015	9/18/2015	\$50.00	4601 176th Pl, Country Club Hills	28-34-109-016-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	648 E. 192nd St, Glenwood	32-11-102-017-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	428 E. 164th Pl, South Holland	29-22-200-021-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	17530 Bernadine, Lansing	30-29-311-048-0000	VH Real Estate Holding 3
						August 2015	9/18/2015	\$50.00	548 E. 161st St, South Holland	29-15-408-016-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	8104 Oakley Ave, Chicago	20-31-116-015-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	3757 W. 148th St, Midlothian	28-11-309-015-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	12 N. Rebecca, Glenwood	32-03-308-020-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	2659 Sparta, Olympia Fields	31-24-203-010-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	616 Hickok Ave, University Park	21-14-13-210-051-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	18340 Mulberry, Country Club Hills	31-03-111-026-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	415 Yates, Calumet City	29-12-220-014-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	23022 East Dr, Richton Park	31-33-407-013-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	17770 Central Park, Country Club Hills	28-35-113-016-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	16503 Louis Ave, South Holland	29-22-105-041-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	19912 Orchard, Lynwood	33-07-321-017-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	1003 Mildred, University Park	21-14-13-220-002 (Will)	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	17802 Ridgewood, Lansing	30-31-202-023-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	14817 Kostner Ave, Midlothian	28-10-405-003-0000	Wheelhouse Investments LLC
						August 2015	9/18/2015	\$50.00	3750 W. 83rd St, Chicago	19-35-127-028-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	3500 Hazel Ln, Hazel Crest	28-26-405-017-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	3831 W. 58th St, Chicago	19-14-125-012-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	18643 Chestnut Ave, Country Club Hills	31-03-207-008-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	18920 Loretto Ln, Country Club Hills	31-03-313-023-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	5838 88th, Oak Lawn	24-05-209-042-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	2548 W. 81st St, Chicago	19-36-212-024-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	17761 Princeton Ln, Country Club Hills	28-35-119-002-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	2759 174th St, Hazel Crest	28-25-412-001-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	802 Bradley Ave, Matteson	31-21-107-010-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	1167 S. Oak Park Ave, Oak Park	16-18-329-021-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	3641 W. 115th St, Alsip	24-23-303-057-0000	Mack Industries II LLC
						August 2015	9/18/2015	\$50.00	3810 S. Harvey, Berwyn	16-32-326-048-0000	Mack Industries II LLC
Bill Pmt	9/18/2015	79984	9/7/15 - 9/18/15	First Community Operating #6212	\$1,922.40	9/7/15 - 9/18/15	9/18/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/2/2015	80262	9/19/15 - 10/2/15	First Community Operating #6212	\$1,922.40	9/19/15 - 10/2/15	10/2/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/16/2015	80410	September 2015	First Community Operating #6212	\$1,400.00						

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						September 2015	10/16/2015	\$50.00	1023 E 194th St, Glenwood	32-11-213-004-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	17107 California, Hazel Crest	28-25-402-002-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	18523 Glen Oaks, Lansing	30-31-319-036-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	1615 Rutherford, Chicago	13-31-419-014-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	3421 W. 124th St, Alsip	24-26-408-004-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	8708 S. Mozart, Evergreen Park	24-01-107-019-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	2428 Erie St, River Grove	12-26-423-032-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	9953 Melvina, Oak Lawn	24-08-305-024-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	9912 S Malta St, Chicago	25-08-301-037-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	22545 Clarendon Ave, Richton Park	31-34-103-012-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	1367 Perry St, Crete	23-15-09-328-010 (Willi)	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	5042 W. Winona St, Chicago	13-09-401-018-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	16666 Prince Dr, South Holland	29-23-411-016-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	3403 Adams St, Bellwood	15-16-111-042-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	23042 Lakeshore, Richton Park	31-33-409-008-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	2511 N. Major Ave, Chicago	13-29-423-017-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	15530 Chicago Rd, South Holland	29-15-106-029-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	17206 Country, East Hazel Crest	29-30-406-016-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	2848 Washington, Franklin Park	12-27-122-014-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	3143 Euclid Ave, Berwyn	16-31-201-032-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	7350 S. Euclid Ave, Chicago	20-25-129-028-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	3746 W. 171st St, Country Club Hills	28-26-306-007-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	9240 S Clifton Pk, Evergreen Park	24-02-408-043-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	2833 N. Mozart St, Chicago	13-25-136-047-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	17938 Chicago Ave, Lansing	30-31-210-051-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	405 Yates, Calumet City	29-12-220-011-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	1104 187th St, Homewood	32-05-213-033-0000	Mack Industries II LLC
						September 2015	10/16/2015	\$50.00	13054 Spencer, Alsip	24-34-107-052-0000	Mack Industries II LLC
Bill Pmt	10/16/2015	80446	10/3/15 - 10/16/15	First Community Operating #6212	\$1,922.40						
						10/3/15 - 10/16/15	10/16/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	10/30/2015	80764	10/12/15 - 10/25/15	First Community Operating #6212	\$1,922.40						
						10/12/15 - 10/25/15	10/30/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	11/13/2015	81069	11/2/15 - 11/13/15	First Community Operating #6212	\$1,922.40						
						11/2/15 - 11/13/15	11/13/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	11/27/2015	81154	October 2015	First Community Operating #6212	\$1,350.00						
						October 2015	11/27/2015	\$50.00	4853 S. Long, Chicago	19-09-112-040-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	17821 Exchange, Lansing	30-31-106-043-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	232 E. Rose St, Glenwood	32-03-417-010-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	3609 W. 57th St, Chicago	19-14-119-051-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	6220 S. Austin, Chicago	19-17-332-022-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	2813 173rd St, Hazel Crest	28-25-323-013-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	3524 S. 56th Ct, Cicero	16-32-406-032-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	20608 Attica Rd, Olympia Fields	31-14-417-020-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	2436 Dora St, Franklin Park	12-28-306-014-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	5297 Northwest Hwy, Chicago	13-08-223-032-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	2749 W. 96th St, Evergreen Park	24-12-207-013-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	16949 Glen Oaks Dr, Country Club Hills	28-26-120-022-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	6 N Wabash Ave, Glenwood	32-03-307-020-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	18052 Wentworth, Lansing	30-32-121-034-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	2117 S. 49th Ct, Cicero	16-21-429-009-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	4516 W. 66th Pl, Chicago	19-22-127-011-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	7516 W. 109th St, Worth	23-13-416-002-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	12034 Elm, Blue Island	24-25-226-023-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	18016 Crawford, Country Club Hills	28-34-404-016-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	722 Geneva, Romeoville	12-02-28-409-032-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	3634 W. 58th Ct, Cicero	16-32-410-036-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	331 Englewood, Bellwood	15-08-235-013-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	22130 Millard, Richton Park	31-26-309-016-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	15402 Elm St, South Holland	29-15-204-017-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	902 Fiesta Ct, University Park	21-14-13-107-020-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	463 N. Laverne, Hillside	15-07-417-007-0000	Mack Industries II LLC
						October 2015	11/27/2015	\$50.00	5708 W. 57th Pl, Chicago	19-17-221-028-0000	Mack Industries II LLC
Bill Pmt	11/27/2015	81364	11/14/15 - 11/27/15	First Community Operating #6212	\$1,922.40						
						11/14/15 - 11/27/15	11/27/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Check	12/4/2015	81420	Outside Labor	First Community Operating #6212	\$300.00						
Bill Pmt	12/11/2015	81630	11/28/15 - 12/11/15	First Community Operating #6212	\$1,922.40						
						11/28/15 - 12/11/15	12/11/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	12/25/2015	81788	November 2015	First Community Operating #6212	\$2,100.00						
						November 2015	12/25/2015	\$50.00	403 Jeffery Ave, Calumet City	29-12-120-010-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1359 Superior, Calumet City	30-19-216-003-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1017 E. 153rd St, South Holland	29-11-325-007-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1378 Buffalo Ave, Calumet City	30-19-216-020-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	515 Merrill Ave, Calumet City	29-12-306-018-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	15101 Chicag Rd, Dolton	29-10-407-052-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	11629 S. Kilbourn, Alsip	24-22-332-016-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	5111 154th St, Oak Forest	28-16-209-030-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	15640 Rose Dr, South Holland	29-15-213-028-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	4929 W. 119th St, Alsip	24-28-201-046-0000	Mack Industries II LLC

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						November 2015	12/25/2015	\$50.00	3006 175th, Hazel Crest	28-25-328-012-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	726 Union, University Park	21-14-12-405-032 (Will)	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	342 Homer Dr, Romeoville	11-04-04-201-002-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	14742 Massasoit, Oak Forest	28-08-402-005-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	6911 S. Karlov, Chicago	19-22-418-011-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	3001 Longfellow, Hazel Crest	28-25-321-015-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	2819 N. Moody, Chicago	13-29-126-014-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	6800 Komensky, Chicago	19-22-414-021-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	15123 Grant St, Dolton	29-10-408-007-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	659 Greenbay Ave, Calumet City	30-07-432-007-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	751 E. 163rd St, South Holland	29-22-204-007-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	15439 Dobson Ave, Dolton	29-14-133-012-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	14958 Highland Ave, Orland Park	27-09-309-020-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	224 Hughes Ave, Lockport	11-04-27-406-012 (Will)	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	4410 152nd St, Midlothian	28-15-103-023-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	16448 Roy St, Oak Forest	28-22-306-052-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1138 E. 152nd St, Dolton	29-11-312-066-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	10953 S. Troy St, Chicago	24-13-309-018-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	17841 Baker, Country Club Hills	28-34-102-019-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	8841 S. Francisco Ave, Evergreen Park	24-01-114-008-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	5035 Kilpatrick, Chicago	19-10-121-038-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	3890 178th St, Country Club Hills	28-35-106-018-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	11737 Campbell, Chicago	24-24-414-039-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	15530 University, Dolton	29-14-142-048-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	2212 W 14th St, Broadview	15-22-126-003-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1533 Spencer Ave, Berkeley	15-08-116-024-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1224 Central, Cicero	16-20-207-032-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	2507 S. 56th Ct, Cicero	16-29-230-004-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	534 Circle, University Park	21-14-12-406-023	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	1322 Arthur, Calumet City	30-19-222-038-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	2301 15th Ave, Broadview	15-22-210-024-0000	Mack Industries II LLC
						November 2015	12/25/2015	\$50.00	831 W Arquilla, Glenwood	29-33-302-003-0000	Mack Industries II LLC
Bill Pmt	12/25/2015	81887	12/14/15 - 12/25/15	First Community Operating #6212	\$1,922.40						
						12/14/15 - 12/25/15	12/25/2015	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	1/8/2016	82117	12/26/15 - 1/8/16	First Community Operating #6212	\$1,922.40						
						12/26/15 - 1/8/16	1/8/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	1/22/2016	82302	December 2015	First Community Operating #6212	\$1,850.00						
						December 2015	1/15/2016	\$50.00	10730 S Avenue N, Chicago	26-17-108-047-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	18760 Springfield, Flossmoor	31-02-301-026-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	1322 S. 58th Ct, Cicero	16-20-210-025-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	5216 W. Foster Ave, Chicago	13-09-219-030-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	17964 Glen Oak, Lansing	30-31-102-047-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	15001 Ridgeway Ave, Midlothian	28-11-322-001-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	18548 Lyn Ct, Homewood	32-05-110-013-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	5159 S Long Ave, Chicago	19-09-304-020-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	16437 Blair, Oak Forest	28-22-416-002-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	5817 Tripp Ave, Chicago	19-15-226-006-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	2219 Cuyler Ave, Berwyn	16-29-101-030-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	3946 189th St, Flossmoor	31-02-305-035-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	17951 Oakley Ave, Lansing	30-31-121-011-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	3647 W. 81st St, Chicago	19-35-116-076-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	3529 W. 77th Pl, Chicago	19-26-407-014-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	4736 Lavergne Ave, Chicago	19-09-203-030-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	2708 89th Pl, Evergreen Park	24-01-213-026-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	15624 Laramie, Oak Forest	28-16-310-016-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	746 Palm, Glenwood	29-33-303-007-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	5828 Burr Oak Ave, Berkeley	15-07-301-037-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	1039 W 103rd St, Chicago	25-17-201-008-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	217 S. Orchard, Hillside	15-17-407-011-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	17137 Coventry, Country Club Hills	28-27-409-061-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	4520 Madison St, Hillside	15-08-328-034-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	1138 E. 152nd St, Dolton	29-11-312-066-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	548 Regent, University Park	21-14-13-212-004-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	8200 W. Leland Ave, Norridge	12-14-202-028-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	4716 Salem Ct, Richton Park	31-27-303-005-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	2802 Highland, Berwyn	16-29-317-021-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	416 Englewood, Bellwood	15-08-406-031-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	4448 Francisco, Chicago	19-01-314-042-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	926 Braemar Rd, Flossmoor	31-01-302-017-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	657 E. 160th Pl, South Holland	29-15-413-009-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	6048 Rob Roy, Oak Forest	28-17-107-007-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	2309 N. 73rd Ct, Elmwood Park	12-36-205-018-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	7506 W. Forest Preserve Ave, Chicago	12-24-201-048-0000	Mack Industries II LLC
						December 2015	1/15/2016	\$50.00	17246 Community, Lansing	30-29-108-063-0000	Mack Industries II LLC
Bill Pmt	1/22/2016	82420	1/9/16 - 1/22/16	First Community Operating #6212	\$1,922.40						
						1/9/16 - 1/22/16	1/22/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	2/5/2016	82605	1/23/16 - 2/5/16	First Community Operating #6212	\$1,922.40						
						1/23/16 - 2/5/16	2/5/2016	\$1,922.40	Acquisitions Department		Consulting Fees

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
Bill Pmt	2/19/2016	82747	January 2016	First Community Operating #6212	\$1,600.00	January 2016	2/19/2016	\$50.00	16731 Highview Ave, Orland Hills	27-27-205-006-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3114 S. Euclid, Berwyn	16-31-200-020-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3940 W. 178th Pl, Country Club Hills	28-35-115-013-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	17707 Community, Lansing	30-29-322-043-0000	Timothy Keely
						January 2016	2/19/2016	\$50.00	4153 W. 115th St, Alsip	24-22-403-015-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	1235 King Circle, South Holland	29-14-212-015-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3201 Highland, Berwyn	16-32-113-001-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	2418 N. McVicker Ave, Chicago	13-29-319-029-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	11255 Church St, Chicago	25-19-211-015-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	10824 S. Ave M, Chicago	26-17-117-063-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	1932 S. 58th Ct, Cicero	16-20-419-037-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3756 W. 78th St, Chicago	19-26-330-065-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	109 McCameron Ave, Lockport	11-04-13-308-026 (Will)	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	4347 181st St, Country Club Hills	28-34-413-004-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	653 154th St, South Holland	29-15-210-001-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	5914 Mobile Ave, Chicago	19-17-301-015-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	2929 W. 101st Pl, Evergreen Park	24-12-311-009-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3655 Sarah St, Franklin Park	12-21-103-037-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	18327 Ridgewood, Lansing	30-31-411-024-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	17229 Burnham, Lansing	30-29-106-011-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	506 Nathan, University Park	21-14-13-403-001-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	11927 Leamington, Alsip	24-28-205-028-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3773 W. Hayford St, Chicago	19-26-311-047-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	3543 178th St, Lansing	30-32-105-056-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	21305 Butterfield,Matteson	31-23-322-002-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	921 W. 187th St, Glenwood	32-04-105-035-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	120 Division, Melrose Park	15-02-343-019-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	12202 Maple, Blue Island	24-25-219-034-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	225 Tallman, Romeoville	11-04-04-225-015 (Will)	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	914 S. Cedar Rd, New Lenox	15-08-22-304-002	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	9706 Austin Ave, Oak Lawn	24-08-122-023-0000	Mack Industries II LLC
						January 2016	2/19/2016	\$50.00	18115 Idlewild Dr, Country Club Hills	28-34-408-013-0000	Mack Industries II LLC
Bill Pmt	2/19/2016	82841	2/6/16 - 2/19/16	First Community Operating #6212	\$1,922.40	2/6/16 - 2/19/16	2/19/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	3/4/2016	83084	2/20/16 - 3/4/16	First Community Operating #6212	\$1,922.40	2/20/16 - 3/4/16	3/4/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	3/18/2016	83154	February 2016	First Community Operating #6212	\$1,050.00	February 2016	3/18/2016	\$50.00	4342 S Saint Louis Ave, Chicago	19-02-401-039-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	1811 Gunderson, Berwyn	16-19-414-005-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	1217 King Ave, South Holland	29-14-212-009-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	3322 St Paul Ave, Bellwood	15-09-317-039-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	3619 216th Pl, Matteson	31-26-112-004-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	15210 Wabash Ave, South Holland	29-10-304-021-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	4411 S. Keating, Chicago	19-03-305-016-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	18951 Cypress Dr, Country Club Hills	31-03-410-018-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	443 E. End Ave, Hillside	15-07-413-001-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	1238 S. 61st Ave, Cicero	16-20-105-030-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	10529 S. Ave M, Chicago	26-08-328-011-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	702 Fitzhenry Ct, Glenwood	29-33-302-018-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	6337 Karlov Ave, Chicago	19-22-206-018-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	4124 Russet Way, Country Club Hills	28-27-408-028-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	10334 Knox, Oak Lawn	24-15-102-056-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	13131 Playfield,Crestwood	24-33-301-053-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	16555 Woodlawn West, South Holland	29-22-115-022-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	3415 W. 60th St, Chicago	19-14-409-018-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	432 Morris Ave, Bellwood	15-09-301-052-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	3341 Schultz Dr, Lansing	30-32-327-001-0000	Mack Industries II LLC
						February 2016	3/18/2016	\$50.00	3649 Neva Ave, Chicago	13-19-128-029-0000	Mack Industries II LLC
Bill Pmt	3/18/2016	83289	3/5/16 - 3/18/16	First Community Operating #6212	\$1,922.40	3/5/16 - 3/18/16	3/18/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	4/1/2016	83582	3/19/16 - 4/1/16	First Community Operating #6212	\$1,922.40	3/19/16 - 4/1/16	4/1/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	4/15/2016	83813	4/2/16 - 4/15/16	First Community Operating #6212	\$1,922.40	4/2/16 - 4/15/16	4/15/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	4/15/2016	83827	March 2016	First Community Operating #6212	\$1,100.00	March 2016	4/15/2016	\$50.00	679 Escanaba, Calumet City	30-07-329-011-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	822 Blackhawk, University Park	21-14-13-204-006 (Will)	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	13144 S. Exchange Ave, Chicago	26-31-110-027-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	5441 S. Hunt, Summit	18-12-415-005-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	10810 Avenue J, Chicago	26-17-120-029-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	3838 W. 82nd Pl, Chicago	19-35-122-068-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	837 Notre Dame, Matteson	31-21-107-004-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	3648 176th Pl, Lansing	30-29-406-058-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	1625 W. 37th Pl, Chicago	17-31-423-007-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	5408 Alexander Pl, Oak Lawn	24-04-114-012-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	17524 Walter St, Lansing	30-29-307-044-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	4224 Arlington Dr, Richton Park	31-27-408-004-0000	Mack Industries II LLC

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Type	Check Date	Check No.	Description	Account	Check Amount	Invoice No.	Invoice Date	Invoice Amount	Address/Memo	PIN	Owner on Invoice Date or Consulting Fees
						March 2016	4/15/2016	\$50.00	16752 Greenwood Ave, South Holland	29-23-306-028-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	2330 Monitor Ave, Chicago	13-32-202-030-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	19048 Jonathan, Homewood	32-05-414-013-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	17790 Princeton Ln, Country Club Hills	28-35-118-015-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	1433 S. Highland Ave, Berwyn	16-20-117-014-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	848 W. Terrace, Glenwood	32-04-104-008-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	9208 Sawyer Ave, Evergreen Park	24-02-414-021-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	3553 W. 72nd Pl, Chicago	19-26-210-036-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	15658 Mutual Terrace, South Holland	29-15-223-011-0000	Mack Industries II LLC
						March 2016	4/15/2016	\$50.00	427 E. 161st St, South Holland	29-15-403-044-0000	Village of South Holland
Bill Pmt	4/29/2016	84054	4/16/16- 4/29/16	First Community Operating #6212	\$1,922.40						
						4/16/16- 4/29/16	4/29/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	5/13/2016	84250	4/30/16 - 5/13/16	First Community Operating #6212	\$1,922.40						
						4/30/16 - 5/13/16	5/13/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	5/27/2016	84385	April 2016	First Community Operating #6212	\$1,250.00						
						April 2016	5/27/2016	\$50.00	3650 176th St, Country Club Hills	28-35-110-038-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	12631 S. Tripp Ave, Alsip	24-27-405-013-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	2842 N. Mango Ave, Chicago	13-29-228-021-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	1302 S. 60th Ct, Cicero	16-20-113-016-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	15340 Drexel, South Holland	29-11-319-005-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	9155 S. Carpenter, Chicago	25-05-403-038-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	10632 S. Avenue J, Chicago	26-17-104-028-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	18531 Oak Ave, Lansing	30-31-321-042-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	591 Paxton, Calumet City	29-12-416-042-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	5935 S. Parkside Ave, Chicago	19-17-407-034-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	3850 216th Pl, Matteson	31-26-107-059-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	3353 Bernice Rd, Lansing	30-29-303-052-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	7300 W. 112th Pl, Worth	23-24-205-009-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	22012 Millard, Richton Park	31-26-307-012-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	1436 Cuyler, Berwyn	16-20-115-036-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	7845 S. Homan Ave, Chicago	19-26-418-015-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	545 Mackinaw, Calumet City	30-07-414-006-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	3535 Washington St, Lansing	30-32-121-017-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	638 161st St, South Holland	29-15-413-019-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	8709 S. New England, Oak Lawn	24-06-104-005-0000	Mack LOC I LLC
						April 2016	5/27/2016	\$50.00	5115 Meade Ave, Chicago	19-08-306-044-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	5532 S. Richmond St, Chicago	19-13-104-031-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	3310 Maple, Hazel Crest	28-26-406-007-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	9328 S. Troy Ave, Evergreen Park	24-01-315-065-0000	Mack Industries II LLC
						April 2016	5/27/2016	\$50.00	16428 Greenwood Ave, South Holland	29-23-101-015-0000	Mack Industries II LLC
Bill Pmt	5/27/2016	84503	5/14/16 - 5/27/16	First Community Operating #6212	\$1,922.40						
						5/14/16 - 5/27/16	5/27/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	6/10/2016	84711	5/28/16 - 6/5/16	First Community Operating #6212	\$1,922.40						
						5/28/16 - 6/5/16	6/10/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Bill Pmt	6/24/2016	84902	May 2016	First Community Operating #6212	\$1,100.00						
						May 2016	6/24/2016	\$50.00	3731 178th Pl, Country Club Hills	28-35-116-026-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	707 Dorchester Dr, Bolingbrook	12-02-02-202-019	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	17947 Oakwood, Lansing	30-31-209-056-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	8023 S. Troy St, Chicago	19-36-109-007-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	7020 W. 75th St, Chicago	19-30-115-044-0000	Mack LOC I LLC
						May 2016	6/24/2016	\$50.00	2724 178th St, Lansing	30-30-313-031-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	726 E. 154th Pl, South Holland	29-15-210-031-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	9339 S. 80th Ct, Hickory Hills	23-02-409-007-0000	Frank Bonham
						May 2016	6/24/2016	\$50.00	4502 Ascot Rd, Richton Park	31-27-311-010-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	2646 N. Mulligan Ave, Chicago	13-29-308-017-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	10428 S. Church St, Chicago	25-17-106-017-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	10917 Buffalo, Chicago	26-18-216-007-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	18404 Ridgewood, Lansing	30-31-418-016-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	22413 Imperial Dr, Richton Park	31-33-103-045-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	3661 Monroe St, Lansing	30-32-204-024-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	15111 E. End Ave, Dolton	29-12-309-033-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	341 N. Wolf Rd, Hillside	15-17-102-003-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	430 E. 170th St, South Holland	29-22-400-050-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	2646 Collins St, Blue Island	24-25-409-018-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	518 E. 12th St, Lockport	11-04-23-412-017-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	22139 Ridgeway Ave, Richton Park	31-26-309-009-0000	Mack Industries II LLC
						May 2016	6/24/2016	\$50.00	18845 Cherry Ln, Lansing	33-06-203-022-0000	Mack Industries II LLC
Bill Pmt	6/24/2016	84968	6/11/16 - 6/24/16	First Community Operating #6212	\$1,922.40						
						6/11/16 - 6/24/16	6/24/2016	\$1,922.40	Acquisitions Department		Consulting Fees
Check	7/8/2016	85080	Consulting Fees	First Community Operating #6212	\$1,922.40						
Check	7/22/2016	85302	Consulting Fees	First Community Operating #6212	\$1,922.40						
Bill Pmt	7/22/2016	85269	June 2016	First Community Operating #6212	\$950.00						
						June 2016	7/22/2016	\$50.00	2002 S. 21st Ave, Broadview	15-15-319-018-0000	Mack Industries II LLC
						June 2016	7/22/2016	\$50.00	18053 Escanaba, Lansing	30-31-115-050-0000	Mack Industries II LLC
						June 2016	7/22/2016	\$50.00	17107 Longfellow Ave, Hazel Crest	28-25-304-025-0000	Mack Industries II LLC
						June 2016	7/22/2016	\$50.00	11436 S. Homan, Chicago	24-23-214-022-0000	Mack Industries II LLC
						June 2016	7/22/2016	\$50.00	17516 Winston Ct, Country Club Hills	28-35-102-016-0000	Judicial Sales Corporation
						June 2016	7/22/2016	\$50.00	4417 Center Ave, Lyons	18-01-311-031-0000	Mack Industries II LLC

Page 19 of 19

EXHIBIT E

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	
)	Bankruptcy No. 17 B 09308
)	(Jointly Administered)
MACK INDUSTRIES, LTD. et. al,)	Chapter 7
)	Judge Carol A. Doyle
Debtors.)	
)	
<hr style="width: 40%; margin-left: 0;"/>)	
RONALD R. PETERSON, AS CHAPTER 7)	
TRUSTEE FOR MACK INDUSTRIES, LTD.,)	
)	
Plaintiff,)	
)	
v.)	Adversary No. 19 A 00508
)	
RIVER WEST REALTY, INC.,)	
)	
Defendant.)	

**ORDER DENYING DEFENDANT’S MOTION TO DISMISS THE TRUSTEE’S FIRST
AMENDED COMPLAINT UNDER RULE 12(b)(6) (DKT. NO. 35)**

I. INTRODUCTION

This matter comes before the Court on River West Realty, Inc.’s (“Defendant”) motion to dismiss the chapter 7 trustee’s (“Trustee”) first amended complaint (“the Complaint”) under Rule 12(b)(6). (Dkt. No. 35.) In the Complaint, Trustee seeks to avoid and recover a series of transfers between January 10, 2013 and October 28, 2016, totaling \$214,534.02. (Dkt. No. 25.) The debtor, Mack Industries, Ltd. (“Debtor”), allegedly made the transfers to Defendant while Debtor was insolvent and without receiving reasonably equivalent value in return. (*Id.*) Trustee also alleges Debtor made the transfers with actual intent to hinder one of its creditors, American Residential Leasing Company, LLC (“American Residential”). (*Id.*) Count I alleges that Debtor’s transfers to Defendant constitute constructive fraud under 740 ILCS 160/5(a)(2), 6(a), and 8(a) and 11

U.S.C. §§ 544(b)(1), 548(a)(1)(B), and 550(a). (*Id.*) Count II alleges that the transfers also constitute actual fraud under 740 ILCS 160/5(a)(1) and 8(a), and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(A), and 550(a). (*Id.*) The Court denies Defendant’s motion to dismiss for the following reasons.

II. APPLICABLE STANDARDS

To survive a motion to dismiss under Rule 12(b)(6), a complaint need only contain a “short and plain statement of the claim showing that the pleader is entitled to relief[.]” Fed. R. Civ. P. 8(a)(2) (made applicable by Fed. R. Bankr. P. 7008(a)). A plaintiff’s obligation is to provide the grounds of his entitlement for relief, which requires more than labels and conclusions. *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007). All well-pleaded facts in the plaintiff’s complaint must be accepted as true. *Fitzgerald v. Barnstable Sch. Comm.*, 555 U.S. 246, 249 (2009).

“The issue is not whether a plaintiff will ultimately prevail but whether the claimant is entitled to offer evidence to support the claims.” *AnchorBank, FSB v. Hofer*, 649 F.3d 610, 614 (7th Cir. 2011). Thus, the complaint must contain enough factual detail to give the defendant “fair notice” of the claim under Rule 8(a), and the allegations must plausibly suggest that the plaintiff has a right to relief, raising that right above the “speculative level.” *EEOC v. Concentra Health Servs.*, 496 F.3d 773, 776 (7th Cir. 2007) (quoting *Twombly*, 550 U.S. at 555).

If actual fraud is alleged, “the circumstances constituting fraud” must be pleaded “with particularity.” Fed. R. Civ. P. 9(b) (made applicable by Fed. R. Bankr. P. 7009). Proving particularity under Rule 9(b) requires alleging “the who, what, when, where, and how of the fraud—the first paragraph of any newspaper story.” *Pirelli Armstrong Tire Corp. Retiree Med. Benefits Trust v. Walgreen Co.*, 631 F.3d 436, 441-42 (7th Cir. 2011) (internal quotations omitted).

The particularity requirement of Rule 9(b) applies to all claims that depend on underlying fraud. Although the circumstances of the fraud must be alleged with particularity, “[m]alice, intent, knowledge, and other conditions of a person’s mind may be alleged generally.” Fed. R. Civ. P. 9(b). The two-hurdle notice-plus-plausibility standard applies, however, to all allegations of mental state. *See Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009).

III. DISCUSSION

Count I: Constructive Fraud Under 740 ILCS 160/5(a)(2), 6(a), and 8(a) and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(B), and 550(a)

Trustee brings Count I of the Complaint under 740 ILCS 160/5(a)(2), 6(a) and 8(a) and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(B), and 550(a), seeking to avoid the \$214,534.02 in collective transfers Debtor made to Defendant because they were constructively fraudulent. (Dkt. No. 25, p. 12.)

In short, § 544(b)(1) “enables the trustee to do in a bankruptcy proceeding what a creditor would have been able to do outside of bankruptcy – except the trustee will recover the property for the benefit of the estate.” *In re Equipment Acquisition Res., Inc.*, 742 F.3d 743, 746 (7th Cir. 2014). The applicable non-bankruptcy law here is the Illinois Uniform Fraudulent Transfer Act. 740 Ill. Comp. Stat. 160/5(a)(2).

The UFTA provides that a trustee may avoid the transfer of a debtor’s assets if the debtor made the transfer:

(2) without receiving a reasonably equivalent value in exchange for the transfer or obligation, and the debtor:

(A) was engaged or was about to engage in a business or a transaction for which the remaining assets of the debtor were unreasonably small in relation to the business or transaction; or

(B) intended to incur, or believed or reasonably

should have believed that he would incur, debts
beyond his ability to pay as they became due.

Id.

Similarly, § 548(a)(1)(B) also allows the trustee to avoid a transfer when the debtor does not receive reasonably equivalent value and, together with the criteria listed in the UFTA above, is either insolvent or made the transfer to an insider. *See* 11 U.S.C. § 548(a)(1)(B).

Trustee alleges that between January 10, 2013, and October 28, 2016, Debtor made a series of transfers to Defendant totaling \$214,534.02. (Dkt. No. 25, p. 9, ¶ 66.) During that time, Defendant would locate real estate that other entities, including some entities that Debtor's principals owned, would acquire. (*Id.*; *see id.* at p. 6, ¶ 43 through p. 7, ¶ 48.) But those entities were not the ones paying Defendant in return for its work. (*Id.* at p. 9, ¶ 67.) Instead, Debtor was the one paying Defendant, and, Trustee alleges, without receiving any reasonably equivalent value in return. (*Id.* at p. 11, ¶ 84.) Trustee alleges Debtor did not receive any reasonably equivalent value in return because the work Defendant performed did not provide Debtor with any value whatsoever and only provided value to the other entities owned by Debtor's principals. (*Id.* at p. 10, ¶ 79 through p. 11 ¶ 84.) Trustee, moreover, alleges Debtor was insolvent when it made those transfers. (*Id.* at p. 11, ¶ 85 through p. 12, ¶ 96.) Because of that, Trustee alleges that the \$214,534.02 that Debtor paid Defendant is avoidable as a constructively fraudulent transfer. (*Id.* at p. 12.)

In its motion to dismiss, Defendant argues that Trustee failed to state its claim with requisite specificity. (Dkt. No. 35, p. 10.) Defendant posits that Trustee did not provide the amount of the transfers, the name of the transferor, or how the transfers were made. (*Id.* at p. 11.) But a review of the Complaint shows otherwise. Trustee attached an exhibit ("Exhibit A") to the Complaint specifying the type of transfer, check date, check number, Debtor's description of the transfer,

Debtor's account from which the transfer was made, and the amount of the check. (Dkt. No. 25, Ex. A.) The information in Exhibit A provides the specific information Defendant argues is lacking. Therefore, the Complaint will not be dismissed for lacking specificity about the transfers.

Defendant also argues that Trustee merely states Defendant did not receive reasonably equivalent value without anything to support that statement. (Dkt. No. 35, p. 13.) Again, the Complaint shows otherwise. Trustee specifically alleges that "the real estate that River West located was acquired by Mack Industries II LLC, Mack Industries III LLC, Mack Industries V LLC, Mack Industries VI LLC, Mack Investments I LLC, Mack Investments II LLC, Mack LOC I LLC, Wheelhouse Investments I LLC, and others." (Dkt. No. 25, p. 10, ¶ 80.) Trustee also alleges that "[b]ecause the Debtor did not own the real estate that River West located, Debtor did not benefit at all from River West's services." (*Id.* at p. 10, ¶ 81.) Finally, Trustee also alleges Debtor was insolvent when it made the transfers, citing Debtor's books and records. (*Id.* at p. 11, ¶ 85 through p. 12, ¶ 96.) Thus, Trustee has pled his claim for constructive fraud under Count I with the requisite specificity the Federal Rules of Civil Procedure demand, and he supported each element of constructive fraud with proper factual allegations. Defendant's motion is therefore denied with respect to Count I.

Count II: Actual Fraud Under 740 ILCS 160/5(a)(1) and 8(a) and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(A), and 550(a)

Trustee brings Count II of the Complaint under 740 ILCS 160/5(a)(1) and 8(a) and 11 U.S.C. §§ 544(b)(1), 548(a)(1)(A), and 550(a), seeking to avoid the \$214,534.02 in collective transfers Debtor made to Defendant because they were actually fraudulent. (Dkt. No. 25, p. 13, ¶¶ 98-100.)

The UFTA provides that a trustee may avoid the transfer of a debtor's asset(s) if the debtor made the transfer "with actual intent to hinder, delay, or defraud any creditor of the debtor. . .[.]" 740 ILCS 160/5(a)(1).

Section 548(a)(1)(A) also enables trustees to avoid transfers debtors make "with actual intent to hinder, delay, or defraud any entity to which the debtor was or became, on or after the date that such transfer was made or such obligation was incurred, indebted..." 11 U.S.C. § 548(a)(1)(A).

In Count II, Trustee alleges Debtor's actions constituted actual fraud because Debtor made the same series of transfers totaling \$214,534.02 to Defendant with actual intent to hinder, delay, or defraud American Residential, one of Debtor's creditors. (Dkt. No. 25, p. 13, ¶¶ 98-100.) Specifically, Trustee alleges that Debtor signed an agreement with American Residential where Debtor was to sublease the American Residential properties to residential tenants, and Debtor was obligated to maintain the properties, to pay American Residential certain rental and other fees each month, and to pay all property taxes levied against the properties. (*Id.* at pp. 3 & 4, ¶ 20.) Trustee also alleges that, after failing to meet its obligations to American Residential, Debtor requested a modification of the agreement. (*Id.* at p. 4, ¶ 26.) According to Trustee, Debtor then allegedly told a senior vice-president of American Residential's prior parent company that if American Residential did not modify the agreement then Debtor would transfer its assets to related entities for nothing in return to hinder American Residential's ability to exercise its legal remedies as a creditor or otherwise. (*Id.* at p. 5, ¶ 30.) Finally, Trustee alleges that Debtor followed through on that threat by continuing to transfer money to Defendant until October 28, 2016. (*Id.* at p. 13, ¶¶ 100-104.)

Defendant's motion to dismiss attacks this count on several grounds. First, Defendant argues that Trustee failed to allege sufficient badges of fraud and that Trustee merely alleges the Debtor was insolvent when it made the transfers. (Dkt. No. 35, p. 9.) Defendant also argues Trustee's allegations about reasonably equivalent value are conclusory. (*Id.*) But those points are irrelevant in proving actual fraud. To be sure, "[a]ctual fraud under the Bankruptcy Code and under the Illinois UFTA requires only that a transfer be made with intent to hinder, delay or defraud creditors." *Peterson v. Atradius Trade Credit Ins., Inc. (In re Lancelot Investors Fund, LP)*, 451 B.R. 833, 839 (Bankr. N.D. Ill. 2011). Trustee has gone far-beyond alleging mere labels and conclusions. Instead, Trustee alleges Debtor transferred money to Defendant specifically to hinder American Residential's ability to exercise its legal remedies (*see* Dkt. No. 25, p. 5, ¶ 30), which is all that is required to satisfy the particularity requirement under Rule 9(b) and therefore survive a motion to dismiss under Rule 12(b)(6).

Defendant also argues it cannot adequately respond to the Complaint because it does not allege when the transfers were made, who made the transfers, and what the value of each transfer was. (Dkt. No. 35, pp. 12 & 13.) The Court disagrees. Both the Complaint and the attached exhibit contain that information. (Dkt. No. 25, p. 9, ¶¶ 66-71; Dkt. No. 25, Ex. A.)

Next, Defendant argues the "very fact that the Trustee seeks transfers for that entire four-year time period refutes any notion that any one transfer was of substantially all of the Debtor's assets, or caused the Debtors to become insolvent." (Dkt. No. 35, p. 11.) The Court will not address this argument because it asks the Court to "evaluate [Trustee's] allegations for internal consistency and weight, issues that cannot be addressed at the motion to dismiss stage." *Lancelot*, 451 B.R. at 839. Defendant's arguments go beyond the scope of a Rule 12(b)(6) motion, and it is

asking the Court to find facts and weigh the evidence, which is improper at this stage of the pleadings. At this stage, factual disputes are resolved in favor of Trustee.

In a similar vein, Defendant attached an affidavit to its motion to dismiss that it argues the Court should consider “because it establishes that [Shannon Pittacora] was an employee of Mack Industries, which could negate the Trustee’s claim against River West.” (Dkt. No. 47, p. 4.) But “[g]enerally, matters outside the pleadings may not be considered on such a motion to dismiss. However, this court has permitted district courts to examine ‘[d]ocuments that a defendant attaches to a motion to dismiss . . . if they are referred to in the plaintiff’s complaint and are central to her claim.’” *Albany Bank & Trust Co. v. Exxon Mobil Corp.*, 310 F.3d 969, 971 (7th Cir. 2002) (quoting *Venture Assocs. Corp. v. Zenith Data Sys. Corp.*, 987 F.2d 429, 431 (7th Cir.1993)). There are two reasons why the Court will not consider the affidavit. First, the Complaint does not refer to the affidavit Defendant attached to its motion to dismiss. Second, although it may bear some relevance to Trustee’s claim, the Court agrees with Trustee that whether a subsequent transferee took for value and in good faith is a defense, and a plaintiff is not required to plead facts negating defenses. *See Xechem, Inc. v. Bristol-Myers Squibb Co.*, 372 F.3d 899, 901 (7th Cir. 2004) (“plaintiffs need not anticipate and attempt to plead around all potential defenses”); *Bayou Superfund, LLC v. WAM Long/Short Fund II L.P. (In re Bayou Group, LLC)*, 362 B.R. 624, 639 (Bankr. S.D.N.Y. 2007). For those reasons, the Court will not consider Defendant’s affidavit for purposing of ruling on its motion to dismiss.

Finally, Defendant contends that the Complaint should be dismissed because Defendant knew nothing about Debtor’s alleged scheme to defraud, which Defendant incorrectly argues both the UFTA and Bankruptcy Code require. (Dkt. No. 35, pp. 11 & 12.) Defendant cites *Lancelot* in support of this position. (Dkt. No. 47, p. 3.) But, in fact, neither the UFTA nor § 548(a)(1)(A)

requires Trustee to plead that Defendant possessed such knowledge. Furthermore, *Lancelot* does not, anywhere in the opinion, state that a plaintiff is required to show a defendant had knowledge or was aware of a debtor's scheme to defraud. *See Lancelot*, 451 B.R. 833. *Lancelot* does, however, require trustees to connect the allegations against a defendant to a debtor's scheme to defraud; and Trustee here has connected the allegations against Defendant to Debtor's scheme to defraud. *See id.* at 839. Trustee's allegations are that Debtor, while insolvent, transferred \$214,534.02 to Defendant as part of its scheme to defraud one its creditors, American Residential, thereby depleting itself of its assets without receiving any reasonably equivalent value in return. Trustee is not required, either by statute or precedent, to allege Defendant knew about Debtor's scheme in order to withstand a motion to dismiss under Rule 12(b)(6).

For those reasons, Defendant's motion to dismiss Count II is denied.

IV. CONCLUSION

In summary, Defendant's motion to dismiss Trustee's Complaint is denied with respect to both Counts I and II because Trustee has properly alleged facts supporting the claims. Defendant is ordered to answer the Complaint by September 29, 2020. A status hearing is set for October 6, 2020 at 10:00 a.m.

ENTERED:



DATE: August 25, 2020

Donald R. Cassling
United States Bankruptcy Judge



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
8/20/2013	813919

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	9111 CENTRAL, OAK LAWN, IL 60453

P.O. Number	Terms	Customer Phone	Rep
	50% down, Balance on Delivery		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Giallo Ornamental		2,064.00
Stainless Sink	M108 (60/40 sink) n/c \$350.00 Stainless Steel Undermount Sink			0.00
Granite 1-1/4"	Kitchen Cap Ledge	Giallo Ornamental		158.40
Granite 3/4"	Measure, Fabricate and Install 1st Floor Master Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink, includes (1) white undermount oval bowl	Golden Garnet		340.00
Granite 3/4"	Measure, Fabricate and Install Lower Level Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink, includes (1) white undermount oval bowl	Golden Garnet		300.00

Fax # 708-755-8600

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Payments/Credits	-\$2,862.40
Balance Due	\$0.00



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 9714 191st Street, Mokena
 708-478-1402 Mokena
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Invoice

Date	Invoice #
8/31/2013	813951

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1014 EAGLE POINT DRIVE MATTESON, IL 60443

P.O. Number	Terms	Customer Phone	Rep
	50% down, Balance on Delivery		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink, ISLAND 38" x 27"	Tan Brown		2,376.00
Stainless Sink	M108 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Measure, Fabricate and Install Master Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sinks, with 2 white undermount bowls	Golden Garnet		600.00
Granite 3/4"	Measure, Fabricate and Install Hall Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sinks, with 2 white undermount bowls	Golden Garnet		550.00

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Total	\$3,526.00
Payments/Credits	-\$3,526.00
Balance Due	\$0.00



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 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
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Invoice

Date	Invoice #
9/16/2013	913986

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	2836 W. 99TH ST. EVERGREEN PARK, IL 60805

PAID
11/01/2013

P.O. Number	Terms	Customer Phone	Rep
	50% down, Balance on Delivery		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink, with (2) caps and island with 8" overhang	Tan Brown		2,328.00
Stainless Sink	M108 Stainless Steel Undermount Sink, n/c \$350.00			0.00
Granite 3/4"	Measure, Fabricate and Install 1st Floor Bathroom Vanity Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink with (1) white oval bowl	Golden Garnet 3/4"		235.00
Granite 3/4"	Measure, Fabricate and Install 2nd Floor Bathroom Vanity Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink with (1) white oval bowl	Golden Garnet 3/4"		235.00
Granite 3/4"	Measure, Fabricate and Install Lower Level Bathroom Vanity Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink with (1) white oval bowl	Golden Garnet 3/4"		260.00

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Total	\$3,058.00
Payments/Credits	-\$3,058.00
Balance Due	\$0.00



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708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
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Invoice

Date	Invoice #
8/30/2013	813941

Bill To	Job Address
MCCLELLAND, JIM & JENNIFER 111 RUFFLED FEATHERS DRIVE LEMONT, IL 60439	

P.O. Number	Terms	Customer Phone	Rep
	50% down, Balance on Delivery		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes Cut-Out and Mounting of Sink (Blanco), no backsplash, cut-out for cooktop, island with double build up of granite on raised section only	Bianco Antico		8,539.00
Granite 1-1/4"	Measure, Fabricate and Install Jim's Office Counter Top, no splash	Black Pearl Leathered		1,235.00
Granite 1-1/4"	Measure, Fabricate and Install Laundry Room Counter Top, Includes 4" Backsplash, Cut-Out and Mounting of Sink (Blanco)	Giallo Napoleon		902.00
Granite 1-1/4"	Measure, Fabricate and Install Master Bath Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Bianco Bahia		2,264.00
Marble	Measure, Fabricate and Install Master Bath Trim Pieces Door Jams both inside & outside of master shower entrance with corner seat	Emperador Light Marble		1,386.00

Fax # 708-755-8600

Total

Payments/Credits

Balance Due

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3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
8/30/2013	813941

Bill To MCCLELLAND, JIM & JENNIFER 111 RUFFLED FEATHERS DRIVE LEMONT, IL 60439	Job Address
--	----------------------------

P.O. Number	Terms	Customer Phone	Rep
	50% down, Balance on Delivery		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Lower Level Bath 60" Counter Top, Includes 4" Backsplash, Cut-Out and Mounting of Sink, PLUS shower seat & threshold	Mid Range Color- TBD		1,087.00
Granite 1-1/4"	Measure, Fabricate and Install OUTDOOR GRILL SURROUND AND BAR AREA 42" WIDE, cut-out for grill and burner ***Need to work with landscaper on details ***	Amber Yellow Leathered		4,891.25
Discount	Discount per Joe			-5,000.00

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Total	\$24,836.25
Payments/Credits	-\$24,836.25
Balance Due	\$0.00



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708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
10/31/2013	10131143

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	130 MARYVIEW MATTESON, IL 60443

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		2,925.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00

Fax # 708-755-8600

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Total	\$2,925.00
Payments/Credits	-\$2,925.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
12/5/2013	12131243

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	3037 MATTHEW LANE HOMEWOOD, IL 60430

PAID
01/08/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink, with standard 1 1/2" overhang on the peninsula	TAN BROWN		2,212.00
Stainless Sink	M108R Stainless Steel Undermount Sink, n/c \$350.00			0.00
Granite 3/4"	Master Bath with 4" backsplash and 2 bowls- white #210	Golden Garnet 3/4"		600.00
Granite 3/4"	Hall Bath with 4" backslash and 2 bowls- white #210	Golden Garnet 3/4"		600.00
Granite 3/4"	Powder room with 4" backsplash and 1 bowl white #210	Golden Garnet 3/4"		235.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,647.00
Payments/Credits	-\$3,647.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
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Invoice

Date	Invoice #
1/8/2014	01141007

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	130 MARYVIEW MATTESON, IL

PAID
02/07/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install BAR Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink, with upper raised snack bar	Tan Brown		1,056.00
Stainless Sink	SB608 Bar Sink, n/c \$150.00			0.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$1,056.00
Payments/Credits	-\$1,056.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
2/28/2014	02141171

Bill To Jim & Ann McClelland 15225 Willow Creek Lane Orland Park, IL 60467	Job Address
--	----------------------------

PAID
04/07/2014

P.O. Number	Terms	Customer Phone	Rep
	Credit Card		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Lower Bar Counter Top 19" wide with windowsill and corner top	Lennon		3,405.00
Discount	Discount per Joe Nicolazzi			-1,565.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$1,840.00
Payments/Credits	-\$1,840.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
3/4/2014	03141181

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	9124 S. Utica Ave. Evergreen Park, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		1,473.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Hall Bath with white undermount sink	Golden Garnet 3/4"		235.00
Granite 3/4"	Master Bath with white undermount sink	Golden Garnet 3/4"		235.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCECPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$1,943.00
Payments/Credits	-\$1,943.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
4/10/2014	04141304

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	VANIO 13724 S. CEDARBEND DRIVE HOMER GLEN, IL 60491

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes Cut-Out and Mounting of Sink, free standing 30" range, no backsplash	Kashmire Cream		2,775.00
Granite 3/4"	Master Bath with 4" backsplash and undermount oval bowl (white)	White Pearl		340.00
Granite 3/4"	Lower Level Vanity top with 4" backsplash and undermount oval bowl (white)	Golden Garnet		260.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,375.00
Payments/Credits	-\$3,375.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
5/8/2014	05141411

Bill To	Job Address
Mack Construction Corporation 6820 Centennial Drive Tinley Park, IL 60477	New Corporate Office 6820 Centennial Drive Tinley Park, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Reception Desk with lower desk area and upper raised reception counter, no splash	Black Pearl Leathered		5,135.00
Granite 1-1/4"	Front Coffee Station with 4" splash	Black Pearl Leathered		689.00
Granite 1-1/4"	Main Conference Room with 4" splash, cut-out for Blanco sink	Black Pearl Leathered		1,742.00
Granite 1-1/4"	Men & Women's Bathroom tops, with 4" splash, cut-out for (3) sinks each with 4" drop face	Black Pearl Leatherd		2,782.00
Ceramic Sink	(6) white #209 sinks			450.00
LG Viatera	Kitchen - cut-out for Blanco Sink, no splash	Snow Storm		2,925.00
Granite 1-1/4"	Discount per Joe			-3,723.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$10,000.00
Payments/Credits	-\$10,000.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
5/22/2014	05141478

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	15400 Lisa CT Orland Park, IL

PAID
06/26/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink, plus upper raised snack 12" wide with undermount sink	Tan Brown		2,860.00
Granite 3/4"	Vanity top with white undermount sink	White Pearl 3/4"		340.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,200.00
Payments/Credits	-\$3,200.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
5/6/2014	05141399

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	2231 S. 61st Ave., Cicero, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		1,867.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Hall Bath with white #210 sink	Golden Garnet 3/4"		235.00
Granite 3/4"	Master Bath with white #210 sink	Golden Garnet 3/4"		235.00
Granite 3/4"	3rd Bath with top mount sink (top is too small for undermount)	Golden Garnet 3/4"		200.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,537.00
Payments/Credits	-\$2,537.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
6/23/2014	06141610

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	108 North Princeton Ave, Villa Park, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Job Site: Mack Estate House - Project Manager: Michele Smith			
	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		2,496.00
Stainless Sink	IPT # M-208 Stainless Steel Undermount Sink With Grates	Stainless Steel		245.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,741.00
Payments/Credits	-\$2,741.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
7/11/2014	07141684

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	11221 BRADLEY COURT, ORLAND PARK, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
	JOB ADDRESS:			
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes Cut-Out and Mounting of Sink, no backsplash, free standing stove	Bainbrook Brown		874.00
Stainless Sink	M208 Stainless Steel Undermount Sink, n/c \$350.00			0.00
Granite 3/4"	Master Bath with splash and (1) white undermount sink	Golden Garnet 3/4"		300.00
Granite 3/4"	Lower Level Bath with splash and (1) white undermount sink	Golden Garnet 3/4"		390.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$1,564.00
Payments/Credits	-\$1,564.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
7/25/2014	07141736

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
SERVICE	Remove existing granite top, cut 30" opening, reinstall top. Total of 5 man hours including travel.			325.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$325.00
Payments/Credits	-\$325.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
8/5/2014	08141774

Bill To	Job Address
Mack Construction Corporation 6820 Centennial Drive Tinley Park, IL 60477	6820 Centennial Drive Tinley Park, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 3/4"	Measure, Fabricate and Install Granite Baseboard in front of water fountain in the front lobby	3/4" black absolute		275.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCEPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$275.00
Payments/Credits	-\$275.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
8/19/2014	08141826

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	4823 S. LACROSSE AVE. CHICAGO, IL

PAID
09/18/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	CALADONIA		2,673.00
Stainless Sink	M208 Stainless Steel Undermount Sink, N/C \$350.00			0.00
Granite 3/4"	Measure, Fabricate and Install Bathroom Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting Of Sink	White Pearl		488.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCECPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,161.00
Payments/Credits	-\$3,161.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
8/15/2014	08141810

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1855 S. RIDGELAND AVE. BERWYN, IL

PAID
09/18/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		2,807.50
Stainless Sink	M208 Stainless Steel Undermount Sink, n/c \$350.00			0.00
Granite 3/4"	Basement Bath with 4" splash and (1) white #210 sink	Golden Garnet		260.00
Granite 3/4"	2nd Floor Bath with 4" splash and (1) white #210 sink	Golden Garnet		260.00
Granite 3/4"	Lower Level Bath with 4" splash and (1) white #210 sink	Golden Garnet		500.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCECPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,827.50
Payments/Credits	-\$3,827.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
8/13/2014	08141793

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	10235 S. CHARLES ST. CHICAGO, IL

PAID
09/18/2014

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		2,149.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	(3) bathrooms with 4" splash and (3) sinks	Golden Garnet 3/4"		705.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,854.00
Payments/Credits	-\$2,854.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
7/31/2014	07141772

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	3633 S. AUSTIN CICERO, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		2,280.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	1ST Floor Bath with 4" splash and (1) white #210	Golden Garnet		235.00
Granite 3/4"	2nd Floor Bath with 4" splash and (1) white #210	Golden Garnet		260.00

Fax # 708-755-8600

ORIGINAL INVOICE
Thank you for your business!

WE ACCECPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,775.00
Payments/Credits	-\$2,775.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
708-755-5200 Steger
9714 191st Street, Mokena
708-478-1402 Mokena
www.TTSGGranite.com

Invoice

Date	Invoice #
9/3/2014	09141886

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	995 SUMMERHILL DRIVE AURORA, IL

P.O. Number	Terms	Customer Phone	Rep
2534	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		3,430.50
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Hall Bath with sink (white #210)	Golden Garnet		340.00
Granite 3/4"	Master Bath with sink (white #210)	Golden Garnet		500.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$4,270.50
Payments/Credits	-\$4,270.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
7/18/2014	07141699

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1519 BATES COURT SCHAUMBURG, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	TAN BROWN		2,380.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Bath off of the garage with 4" splash and (1) white undermount sink	White Pearl		235.00
Granite 3/4"	Main bath with 4" splash and (1) white undermount sink	White Pearl		260.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,875.00
Payments/Credits	-\$2,875.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
9/23/2014	09141932

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	3245 Cuyler, Berwyn, IL

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Caledonia		2,215.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Basement with (2) white undermount sinks	White Pearl 3/4"		600.00
Granite 3/4"	1st Floor Bath with (1) white undermount sink	White Pearl 3/4"		260.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,075.00
Payments/Credits	-\$3,075.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
9/30/2014	09141958

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1728 PATRICIA, FLOSSMOOR, IL

P.O. Number	Terms	Customer Phone	Rep
2908	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		4,698.50
Stainless Sink	M208 Stainless Steel Undermount Sink, n/c \$350.00			0.00
Granite 3/4"	Powder Room with (1) white undermount #210 sink	Golden Garnet		340.00
Granite 3/4"	Hall Bath with (1) white undermount #210 sink	Golden Garnet		235.00
Granite 1-1/4"	Living Room Wet Bar with 4" splash	Tan Brown		648.00
Stainless Sink	SB608 Bar Sink for the above Living room wet bar, n/c \$135.00			0.00
Granite 1-1/4"	Master Bath (2) tops with splashes - Main sink top with (2) white #210 sinks and Dressing Area top with 4" splash	Tan Brown		1,210.00
Granite 1-1/4"	Added 9/29 Lower Level Bath with 4" splash with (1) white #209 sink	Tan Brown		390.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$7,521.50
Payments/Credits	-\$7,521.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
10/9/2014	10141985

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	4325 W. 83rd St. Chicago, IL 60652

P.O. Number	Terms	Customer Phone	Rep
3209	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		2,529.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	(3) vanity tops with backslashes, (3) white #210 sink	Golden Garnet		940.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,469.00
Payments/Credits	-\$3,469.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
10/13/2014	10142004

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	8453 KENNETH, CHICAGO, IL

P.O. Number	Terms	Customer Phone	Rep
3300	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Tan Brown		2,385.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	1st Floor Bath with 4" splash and sink	Golden Garnet		300.00
Granite 3/4"	Basement Bath with 4" splash and sink	Golden Garnet		235.00
Granite 1-1/4"	Basement Bar with 4" splash and SB708 undermount sink	Tan Brown		1,520.00

Fax # 708-755-8600

ORIGINAL INVOICE
 Thank you for your business!

WE ACCEPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$4,440.00
Payments/Credits	-\$4,440.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
12/4/2014	12142188

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1720 W 99th St. Chicago, IL 60643

PAID
01/06/2015

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul Platino		2,016.00
Granite 3/4"	Measure, Fabricate and Install Main level Bath Counter Tops, Includes 4" Backsplash, Cut-Out, Sink and Mounting Of Sink	White Pearl		275.00
Granite 3/4"	Measure, Fabricate and Install Basement Bath Counter Tops, Includes 4" Backsplash, Cut-Out, Sink and Mounting Of Sink	White Pearl		695.00

Fax # 708-755-8600

ORIGINAL INVOICE
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Total	\$2,986.00
Payments/Credits	-\$2,986.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
12/5/2014	12142199

Bill To	Job Address
Mack Construction Corporation 6820 Centennial Drive Tinley Park, IL 60477	7644 W. 66TH ST. BEDFORD PARK, IL

PAID
01/06/2015

P.O. Number	Terms	Customer Phone	Rep
4926	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		1,828.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	30" vanity with sink	White Pearl 3/4"		235.00
Granite 3/4"	36" vanity with sink	White Pearl 3/4"		260.00

Fax # 708-755-8600

ORIGINAL INVOICE

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Total	\$2,323.00
Payments/Credits	-\$2,323.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
1/5/2015	01151012

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	1322 S. 58TH AVE. CICERO, IL 60804

PAID
02/09/2015

P.O. Number	Terms	Customer Phone	Rep
5523	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen #1 Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		2,112.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 1-1/4"	Measure, Fabricate and Install Kitchen #2 Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		1,982.50
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Basement bath with 4" splash and sink	White Pearl		235.00
Granite 3/4"	2nd Floor bath with 4" splash and sink	White Pearl		260.00
Granite 3/4"	1st Floor bath with 4" splash and sink	White Pearl		260.00

Fax # 708-755-8600

ORIGINAL INVOICE

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Total	\$4,849.50
Payments/Credits	-\$4,849.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
1/5/2015	01151013

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	3702 S. 53RD COURT CICERO, IL

PAID
02/09/2015

P.O. Number	Terms	Customer Phone	Rep
5522	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		1,286.50
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Bath #2 with 4" splash and sink	White Pearl		235.00
Granite 3/4"	Master Bath with 4" splash and sinks with shower seat added per KR	White Pearl		634.00

Fax # 708-755-8600

ORIGINAL INVOICE

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Total	\$2,155.50
Payments/Credits	-\$2,155.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
1/6/2015	01151017

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	151 Stanton Drive Bartlett, IL

P.O. Number	Terms	Customer Phone	Rep
5577	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		1,920.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	Powder Room with white undermount bowl	White Pearl		235.00
Granite 3/4"	Hall Bath with white undermount bowls	White Pearl		550.00
Granite 3/4"	Master Bath with white undermount bowls	White Pearl		550.00

Fax # 708-755-8600

ORIGINAL INVOICE
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WE ACCECPT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$3,255.00
Payments/Credits	-\$3,255.00
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
12/30/2014	12142271

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	2616 97TH PLACE EVERGREEN PARK, IL

PAID
02/09/2015

P.O. Number	Terms	Customer Phone	Rep
	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink.	Azul		1,708.00
Stainless Sink	M208 Stainless Steel Undermount Sink			0.00
Granite 3/4"	1st Floor Bath with sink	White Pearl		235.00
Granite 1-1/4"	Option to add 12" overhang to the peninsula			230.50

Fax # 708-755-8600

ORIGINAL INVOICE

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Total	\$2,173.50
Payments/Credits	-\$2,173.50
Balance Due	\$0.00



3225 Louis Sherman Drive, Steger 60475
 708-755-5200 Steger
 9714 191st Street, Mokena
 708-478-1402 Mokena
 www.TTSGGranite.com

Invoice

Date	Invoice #
2/13/2015	02151138

Bill To	Job Address
MACK ESTATES 6820 Centennial Drive Tinley Park, IL 60477	727 S Finely Road Lombard, IL 60148

PAID
03/25/2015

P.O. Number	Terms	Customer Phone	Rep
6699	Net 30 days		Kathy

Item Code	Description	Color	Edge Profile	Amount
	Mack Estate Home: - Mike Smith, Project Manager			
Granite 1-1/4"	Measure, Fabricate and Install Kitchen Counter Tops, Includes 4" Backsplash, Cut-Out and Mounting of Sink. (40 SQFT)	Arzul		1,920.00
Stainless Sink	IPT #M-208 Stainless Steel Undermount Sink With Grates			0.00
Granite 1-1/4"	Measure, Fabricate and Install Master Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting of Sinks (2)	Arzul		528.00
Ceramic Sink	(2) TTS # 210 White Undermount Sinks	White		0.00
Granite 3/4"	Measure, Fabricate and Install Hall Bath Counter Top, Includes 4" Backsplash, Cut-Out and Mounting Of Sink (1)	White Pearl		235.00
Ceramic Sink	(1) TTS # 210 White Undermount Sink	White		0.00

Fax # 708-755-8600

ORIGINAL INVOICE

Thank you for your business!

WE ACCEPCT ALL MAJOR CREDIT CARDS EXCEPT AMEX - PLEASE CALL TODAY

Total	\$2,683.00
Payments/Credits	-\$2,683.00
Balance Due	\$0.00

EXHIBIT G

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION**

In re:)	Chapter 7
)	
Mack Industries, Ltd., et al.,)	
)	No. 17 B 09308
)	
Debtor.)	
<hr style="width: 40%; margin-left: 0;"/>)	
)	
Ronald R. Peterson, as Chapter 7 Trustee,)	
)	
Plaintiff,)	
)	
v.)	No. 19 A 00372
)	
Capital One N.A. et al,)	
)	
Defendant.)	Judge Carol A. Doyle

Memorandum Opinion

Chapter 7 trustee Ronald Peterson filed this adversary proceeding against Capital One, N.A., Capital One Financial Corp. (collectively “Capital One”), and Menard Inc. He seeks to recover as fraudulent transfers payments made by debtor Mack Industries Ltd. (“Mack”) to Capital One for purchases Mack made at Menards using a Capital One credit card. The trustee contends that Mack used the goods it purchased from Menards to improve real property that it did not own as part of a fraudulent scheme to deplete Mack’s assets. He also seeks to recover some of the payments as preferences.

Capital One moved to dismiss most of the amended complaint. It argues that the trustee has not alleged a plausible claim for fraudulent transfer based on either constructive fraud or actual fraud. It also argues that the trustee has not alleged any claims against Menards so the complaint against it should be dismissed in its entirety. Capital One is correct regarding the fraudulent transfer claim against it based on constructive fraud and all the claims against Menards. Those claims will be dismissed. Capital One's motion to dismiss the fraudulent transfer claim against it based on actual fraud will be denied.

1. Background and Amended Complaint

The trustee filed a complaint against Capital One and Menards alleging two claims to avoid fraudulent transfers and a claim to avoid preferential transfers. The court granted a motion to dismiss a similar adversary proceeding in *Peterson v. McClean (In re Mack Industries, Ltd.)*, No. 19-ap-00433, 2019 Bankr LEXIS 3603 (Bankr. N.D. Ill. Nov. 20, 2019). The fraudulent transfer claims in this case were similar to those alleged in *McClean*. The trustee consented to the dismissal of his complaint against Capital One and Menards. He was granted leave to amend and he filed an amended complaint.

In the amended complaint, the trustee again alleges two claims to avoid fraudulent transfers and a claim to avoid preferential transfers. He seeks to recover payments of approximately \$3.3 million that Mack made to Capital One to pay down its credit card balances. Exhibit A to the amended complaint shows payments made by Mack to Capital One between January 2, 2013 and March 22, 2017. Exhibit B is a 275 page document entitled "Bills and Charges." It contains approximately 12,000 lines stating a date, amount, address and PIN

number, and owner of the property, presumably where Mack used supplies purchased at Menards with the Capital One credit card. The trustee acknowledged in response to the motion to dismiss that Exhibit B shows that approximately \$700,000 of the “bills and charges” were for supplies allegedly used in property owned by American Residential Leasing Company LLC, an unsecured creditor of Mack. He is not seeking to recover those transfers. He seeks to recover the remaining \$2.6 million in payments to Capital One, which he claims were for charges Mack made to purchase building supplies that were used in properties owned by parties other than Mack or American Residential.

In Count 1, the trustee alleges that the payments were constructively fraudulent under the Illinois Uniform Fraudulent Transfer Act and § 548(a)(1)(B) of the Bankruptcy Code. He contends that Mack did not receive reasonably equivalent value for the payments to Capital One because Mack used the building supplies it purchased to improve properties owned by third parties. In Count 2, the trustee alleges that Mack incurred the charges and made the payments to Capital One with actual intent to defraud. He bases this claim primarily on a statement allegedly made by a vice president of Mack in June 2014 threatening American Residential that if it did not renegotiate a significant contract, Mack would dissipate its assets to prevent American Residential from collecting from Mack. In Count 3, the trustee seeks to recover approximately \$38,000 in payments to Capital One as preferences under § 547 of the Bankruptcy Code. Capital One is not seeking dismissal of the preference claim against it.

Regarding the actual fraud claim in Count 2, the amended complaint alleges as follows. Mack’s primary business was “flipping houses” - buying properties, improving them, and selling or renting them. Amended Complaint ¶ 8. American Residential purchased hundreds of

properties from Mack, which then leased the properties back from American Residential under a Master Lease Agreement (“Agreement”) and sublet them to tenants. In the summer of 2014, Mack began to claim that it could not meet its obligations under the Agreement and sought to renegotiate it. When American Residential resisted, Erik Workman, Mack’s Vice President of Sales and Marketing, told Christopher Byce, formerly Senior Vice President of Investments of American Residential’s prior parent company, that “the Debtor would transfer its assets to related entities for nothing in return to hinder American Residential’s ability to exercise its legal remedies as a creditor.” Amended Complaint, ¶ 32. By September 2014, Mack had stopped making payments under the Agreement. Amended Complaint ¶ 36. In December 2014, Mack sent American Residential a proposed revised contract that Mack said was, essentially, not negotiable. Amended Complaint ¶ 30. American Residential refused to change the Agreement.

Even before Workman made his threat about dissipating assets, Mack began to “prepare for a possible breakdown in the business relationship.” Amended Complaint ¶ 41. “In the months leading up to and during the negotiations with American Residential, the debtor had already begun dissipating its assets.” ¶ 42. Before 2013, the McClellands, who own Mack and many related entities, ran almost the entire real estate business in Mack’s name. Amended Complaint ¶ 43. In 2013, the McClellands began to “create new entities and to divert business opportunities and assets from the Debtor to those entities.” Amended Complaint ¶ 44. They created at least 15 new entities in 2013, at least four new entities in 2014, at least six new entities in 2015, and at least two new entities in 2016. Amended Complaint ¶ 45. Mack owned five of these entities: Mack Industries II LLC, Mack Industries III LLC, Mack Industries IV LLC, Mack Industries V LLC, and Mack Industries VI LLC. Amended Complaint ¶ 46. All the other

new entities were owned by James K McClelland, James H. McClelland (James K. McClelland's son), or both. Amended Complaint ¶ 47.

Although Mack owned some real estate after 2013, "the vast majority of real estate acquired for flipping was acquired by the new entities." Amended Complaint ¶ 49. Mack also transferred real estate from itself to the new entities. Amended Complaint ¶¶ 49, 50. The McClellands thereby reduced the assets "that the debtor had that could be collected by American Residential." Amended Complaint ¶ 50. Mack also "drew down" on its own assets to benefit the other entities. Amended Complaint ¶ 51. It paid contractors to work on and improve real property owned by the other entities, and paid bank loans incurred by the other entities. Complaint ¶ 52. The McClellands also "extracted" at least \$10.7 million in cash from Mack and other entities. Amended Complaint ¶ 54. Mack concealed its dissipation from American Residential. After June 2014, it failed to provide American Residential with Quarterly Statements required under the Agreement detailing its income. Amended Complaint ¶¶ 56, 57. American Residential tried to take over its own properties in 2016 but Mack refused to provide information about the subtenants. Amended Complaint ¶ 60. In March 2016, American Residential sued Mack and related entities in state court. Amended Complaint ¶ 39.

2. Constructive Fraud

Capital One argues that the fraudulent transfer claim based on constructive fraud in Count 1 must be dismissed because the trustee has failed to allege an essential element of his claim: that Mack did not receive reasonably equivalent value for the payments to Capital One. It asserts, and the trustee does not contest, that the complaint and attachments show that Capital

One provided credit to Mack and Mack's payments were on account of that antecedent debt. Capital One therefore contends that Mack received reasonably equivalent value as a matter of law for the debt repayments. It argues that what Mack chose to do with the goods it purchased from Menards with the credit provided by Capital One does not matter. The trustee responds that *Mack* did not receive any value because Mack used the goods it purchased with the credit provided by Capital One to increase the value of properties that Mack did not own. Capital One is correct. Mack received reasonably equivalent value for each payment to Capital One.

The trustee brings his constructive fraud claim under the Illinois Uniform Fraudulent Transfer Act, 740 ILCS 160/5(a)(2), 6(a), and 8(a), via § 544(b)(1) of the Bankruptcy Code, as well as under § 548(a)(1)(B) of the Bankruptcy Code. A plaintiff seeking to avoid a fraudulent transfer based on constructive fraud under § 548(a)(1)(B) must plead and prove the following: (1) a transfer of the debtor's property or interest; (2) made within two years before the date the bankruptcy petition was filed; (3) for which the debtor received less than a reasonably equivalent value in return; and (4) that the debtor (a) was insolvent on the date of the transfer or became insolvent as a result, (b) engaged in business or a transaction as a result of which the debtor's remaining capital was unreasonably small, or (c) intended to incur, or should have known he would incur, debts he would be unable to pay. *KHI Liquidation Trust v. C. Goshy Enterprises, Inc. (In re Kimball Hill, Inc.)*, No. 10-ap-998, 2012 WL 5880657, at *5 (Bankr. N.D. Ill. Nov. 19, 2012); *Cox v. Grube (In re Grube)*, No. 09-ap-8111, 2012 WL 3263905, at *4 (Bankr. C.D. Ill. Aug. 9, 2012); *Martino v. Edison Worldwide Capital (In re Randy)*, 189 B.R. 425, 440 (Bankr. N.D. Ill. 1995). Under the IUFTA, the elements are the same but the statute of limitations is four years. 740 ILCS 160/5, 160/10; *Reinbold v. Morton Community Bank (In re*

Mid-Illini Hardwoods, LLC), 576 B.R. 598, 604 (Bankr. C.D. Ill 2017); *see Zimmerman v. Paulsen*, 524 F. Supp. 2d 1077, 1080 (N.D. Ill. 2007).

-Reasonably Equivalent Value

The standard for reasonably equivalent value is the same under Illinois law and § 548(a). *Baldi v. Samuel Son & Co, Ltd.*, 548 F.3d 579, 580 (7th Cir. 2008); *Creditor's Comm. of Jumer's Castle Lodge, Inc. v. Jumer (In re Jumer's Castle Lodge Inc.)*, 472 F.3d 943, 947 (7th Cir. 2007) (“Because the IUFTA is a uniform act, we may look to cases decided under 11 U.S.C. § 548, as well as cases interpreting other states’ versions of the [UFTA], to determine the meaning of the phrase ‘reasonably equivalent value.’”).

Determining whether a debtor received reasonably equivalent value for the transfer involves a three-part inquiry: (1) did the debtor receive some value, (2) was the value received in exchange for the transfer by the debtor, and (3) did the value received by the debtor have a reasonable equivalence to what the debtor transferred. *Mid-Illini Hardwoods*, 576 B.R. at 604. Here, the trustee does not dispute that Mack incurred debt by charging purchases on its Capital One credit card and that the debt was decreased by the amount paid to Capital One so the second and third inquiries are not disputed. The parties contest whether the facts alleged can establish that *Mack* received value from paying its credit card debt when it used the goods purchased with the credit card to improve properties owned by third parties.

The focus of the inquiry regarding reasonably equivalent value “must be on the specific transaction the trustee seeks to avoid, *i.e.*, the *quid pro quo* exchange between the debtor and the transferee, rather than an analysis of the transaction’s overall value to a debtor as it relates to the

welfare of the debtor's business." *Balaber-Strauss v. Sixty-Fve Brokers (In re Churchill Mort. Inv. Corp.)*, 256 B.R. 664, 678 (Bankr. S.D.N.Y. 2000). Courts seek to ensure that there is an exchange of property that is a fair equivalent and "not disproportionately small as compared with the value of the property or obligation obtained." *Id.* Courts examine "the objective value of the goods and services provided rather than the impact the goods and services had on the bankrupt enterprise." *Trauner v Delta Air Lines, Inc. (In re Think Retail Solutions, LLC)*, No. 17-ap-5078, 2019 WL 2912717 at *16 (Bankr. N.D. Ga. 2019) (quoting *Orlick v. Kozyak (In re Financial Federated Title & Trust, Inc.)*, 872 F.3d 1235, 1248 (11th Cir. 2017) and *Merrill v. Allen (In re Universal Clearing House Co.)*, 60 B.R. 985, 998-99 (D. Utah 1986)); *PSN Liquidating Trust v. Intelsat Corp (In re PSN USA, Inc.)*, 615 F. App'x 925, 932 (11th Cir. 2015 (the debtor may receive value even if the transfer increases its insolvency). "[U]nder § 548, in assessing the "value" of property, goods or services provided directly to the debtor, the question is not whether the debtor subjectively benefitted from the property it received; the operative question is whether the property, goods, or serviced provided had objective value." *McHenry v. Dillworth (In re Caribbean Fuels Am., Inc.)*, 688 F. App'x 890, 894-95 (11th Cir. 2017).

Courts determine the objective value as of the date of the transfers, not on a post-transfer basis that considers whether the purchase was wise or impacted the financial picture of the debtor. *Think Retail*, 2019 WL 2912717 at *16. *See also Kipperman v. Onex Corp.*, 411 B.R. 805, 837 (N.D. Ga. 2009) ("Courts will not look with hindsight at a transaction because such an approach could transform fraudulent conveyance law into an insurance policy for creditors."). This is true even when the transaction in question harmed creditors and diminished the debtor's bankruptcy estate. As the *Churchill* court noted, debtors often engage in "improvident purchases

or expenditures which have a detrimental effect on creditors and may even be a precipitating cause of bankruptcy.” *Id.* at 681. “The fact that transactions may ‘exacerbate the harm to creditors and diminish the debtor’s estate’ from an overall perspective does not mean that the debtor received less than reasonably equivalent value in respect of each particular transaction.” *Id.*

In *Churchill*, a trustee sought to avoid transfers made to various brokers who originated mortgages and solicited investors in a debtor that was operating a ponzi scheme. The trustee alleged that the payments to the brokers were avoidable as fraudulent transfers based on actual and constructive fraud because the business generated by the brokers clothed the debtor’s fraudulent enterprise in an aura of respectability and enabled the corrupt management to continue its scheme. The court held that each transaction must be evaluated based solely on the value given and received by the debtor. The debtor paid a reasonable amount for the services it received so the court concluded that the debtor received reasonably equivalent value without considering how the services enabled the debtor to carry out its fraud.

The analysis regarding reasonably equivalent value does not change when a third party benefits from the transfer. In *Think Retail*, 2019 WL 2912717, the court held that a debtor received reasonably equivalent value from an airline when the debtor’s principal purchased airline tickets for her personal use and the personal use of others. The debtor got reasonably equivalent value for the airline tickets because it controlled all the rights it purchased from the airline. These rights included the right to a seat on a flight, the right to designate the name of the passenger for the ticket, the right to cancel the flight, and the right to modify the scheduled travel date and destination. The use of those rights by third parties did not negate the objective value

given by the airline to the debtor.

In fact, even when a debtor pays the debt of another party, it may nevertheless receive reasonably equivalent value. Though the general rule is that a debtor does not receive reasonably equivalent value by paying the debt of a third party, courts still examine the facts and circumstances to determine whether the debtor indirectly got reasonably equivalent value, such as through multi-party transactions. *Mid-Illini Hardwoods*, 576 B.R. at 607.

-Value - Repaying an Antecedent Debt

This court has previously concluded in similar adversary proceedings that Mack received reasonably equivalent value from vendors who provided goods and services to Mack no matter what Mack chose to do with those goods and services. *Peterson v. Ferguson Enterprises, Inc. (In re Mack Industries, Ltd.)*, No. 19-ap-436 (Bankr. N.D. Ill. Nov. 10, 2020); *Peterson v. TTS Granite, Inc. (In re Mack Industries, Ltd.)*, No. 19-ap-522 (Bankr. N.D. Ill. Nov. 10, 2019). Here, Capital One's argument is even stronger than that of vendors of goods and services. A debtor always receives reasonably equivalent value when it repays its own antecedent debt. That is exactly what Mack did with each payment listed in Exhibit A to the amended complaint.

Section 548(d) provides that repayment of an antecedent debt is "value" for purposes of § 548, including for determining reasonably equivalent value in § 548(a). It states that "value" means "satisfaction ... of a present or antecedent debt of the debtor." 11 U.S.C. § 548(d)(2)(A). Many courts have held that a reduction in debt owed by a debtor is reasonably equivalent value. As the Seventh Circuit explained in *B.E.L.T., Inc. v. Wachovia Corp.*, 403 F.3d 474,477-78 (7th Cir. 2005), "repayment of an antecedent loan comes within the 'reasonably

equivalent value' rule - which is just another way of saying that preferential transfers differ from fraudulent conveyances.” Similarly, the Second Circuit affirmed the dismissal of a complaint alleging a constructively fraudulent transfer when the debtor repaid a loan when the lender was aware that insiders were looting the debtor, which had obtained new loans to repay the loan in question. *Sharp Int’l Corp. v. State Street Bank and Trust Co. (In re Sharp Int’l Corp.)*, 403 F.3d 43, 53-56 (2nd Cir. 2005). The Sixth Circuit reached the same conclusion, stating that “[t]ypically, a dollar-for-dollar reduction in debt constitutes - as a matter of law - reasonably equivalent value for purposes of the fraudulent-transfer statutes.” *Southeast Waffles, LLC v. U.S. Dept. of Treasury (In re Southeast Waffles, LLC)*, 702 F.3d 850, 857 (6th Cir. 2012). *See also Cox v. Nostaw, Inc (In re Central Ill. Energy Coop.)*, 521 B.R. 868, 873 (Bankr. C.D. Ill. 2014) (“a debtor’s transfer of funds in satisfaction of its own debt is not constructively fraudulent”); *Official Comm. of Unsecured Creditors v. BNP Paribas (In re Propex Inc.)*, 415 B.R. 321, 324 (Bankr. E.D. Tenn. 2009) (finding reasonably equivalent value as a matter of law under the Bankruptcy Code and UFTA when the debtor received a dollar-for-dollar reduction in debt in exchange for its \$20 million payment).

The trustee argues that this principle does not apply here because Mack fraudulently incurred the obligation it was repaying. He contends that all the cases relied on by Capital One involved underlying debt that was not “at issue.” The trustee presumably means that no one in those cases questioned whether the underlying debt that was repaid was incurred for the benefit of the debtor. The trustee contends that the debt to Capital One was fraudulently incurred because Mack used what it purchased at Menards with credit from Capital One to improve properties owned by others. This argument has no merit for two reasons.

-Fraudulent Intent Not Relevant

First, as the *B.E.L.T.* court held, repayment of an antecedent debt provides reasonably equivalent value as a matter of law for purposes of constructive fraud. It makes no difference whether the debtor incurred the debt to benefit another. *See also Brandt v. KLC Financial, Inc. (In re Equipment Acquisition Resources, Inc.)*, 481 B.R. 422, 428 n.4 (Bankr. N.D. Ill. 2012) (explaining the difference between constructive fraud and actual fraud, noting that the transferor's intent is irrelevant to a constructively fraudulent transfer). The three cases cited by the trustee do not hold otherwise. All three involved a debtor guaranteeing the debt of another entity. *Liebowitz v. Parkway Bank and Trust Co. (In re Image Worldwide, Ltd.)*, 139 F.3d 574 (7th Cir. 1998) (the court noted that intercorporate guarantees can benefit the guaranteeing corporation but concluded that the debtor in that case did not receive reasonably equivalent value for its guarantee of a related entity's debt); *Tourtellot v. Huntington Nat. Bank (In re Renegade Holdings, Inc.)*, 457 B.R. 441 (Bankr. N.D.N.C. 2011) (a debtor did not receive reasonably equivalent value when it guaranteed the debt of a related entity); *In re Doctor's Hospital of Hyde Park v. Desnick (In re Doctor's Hospital)*, 360 B.R. 787 (Bankr. N.D. Ill. 2007), *aff'd*, 406 B.R. 299 (N.D. Ill. 2009), *vacated on other grounds sub nom. Paloian v. LaSalle Bank, N.A.*, 619 F.3d 688 (7th Cir. (2010) (same). *See also Hackeling v. Charter Financial, Inc. (In re Luis Electrical Contracting Corp.)*, 149 B.R. 751, 758-59 (lender provided reasonably equivalent value for loan repayment even though loan proceeds went to a third party for leases of equipment that did not exist). None of the cases cited by the trustee involved a debtor paying down its own debt.

Here, the trustee does not allege that Mack guaranteed or otherwise took on the debt of another. Instead, he alleges that Mack opened the account with Capital One and used the credit

provided to pay for purchases it made from Menards. Amended Complaint ¶¶ 15, 16. The debt to Capital One was solely Mack's. Mack received the credit to purchase whatever it chose, it alone owned the goods it purchased, and it alone owed the money to Capital One. The reduction in the balance owed to Capital One provided reasonably equivalent value to Mack as a matter of law no matter what Mack's intent.

-Menards Provided Value

Second, the trustee's argument fails because the premise underlying his claim - that the purchases from Menards provided no value to Mack - is mistaken. As this court recently concluded in *TTS Granite* and *Ferguson*, when an entity provided goods and services to Mack in exchange for payment of a reasonable price, Mack received reasonably equivalent value no matter what Mack then chose to do with the goods and services it purchased. Here, Mack received reasonably equivalent value for the goods it purchased from Menards.

As discussed above, to determine whether Mack got reasonably equivalent value, the court must examine only the specific transactions at issue, not Mack's overall financial condition or any fraudulent scheme that Mack's management might have been perpetrating. Here, Menards provided real value to Mack. Mack ordered building supplies, paid for them using credit from Capital One, and became the sole owner of supplies. The purchases underlying the credit transactions with Capital One involved a simple *quid quo pro* - goods exchanged for payment. Like the airline tickets purchased in *Think Retail*, Mack got what it paid for in each transaction: building supplies that it could use any way it chose. The fact that Mack may have used the supplies it owned to benefit others or that Mack may have been engaging in an overall

scheme to rid itself of assets does not diminish the value Menards provided to Mack.

The trustee has failed to cite a single case in which an arms-length transaction between a debtor and a vendor was avoided as constructively fraudulent based on what the debtor chose to do with those goods and services. The trustee cites only an unpublished order in *Krudy v. Chase Bank USA, N.A. (In re Rainmaker Group, Inc.)*, No. 12-ap-50104, 2013 Bankr. LEXIS 1483 (Bankr. S.D. Ind. April 9, 2013). In *Krudy*, a chapter 7 trustee filed a “bare-bones” complaint alleging a fraudulent transfer claim against a corporate debtor’s principals who had incurred corporate debt for personal purchases. The court concluded that the trustee must be pursuing a constructive fraud claim under Indiana law and that he sufficiently pled the element of lack of reasonably equivalent value. The court stated that “[f]raudulent transfer statutes exist to undo the damage done by bad-acting corporate principals who use the corporate credit card to incur personal debt and use corporate funds to pay for it.” *Id.* at *7. The court cited no authority for this statement. It is both unsupported and incorrect. As explained above and in myriad cases, the purpose of constructive fraudulent conveyance law is to ensure there was a *quid pro quo* for what the debtor gave. The decision also is directly contrary to binding Seventh Circuit authority, discussed above, recognizing that repayment of a loan gives reasonably equivalent value for purposes of constructive fraudulent transfer law. The *Krudy* order has no persuasive value.

Fraudulent conveyance law is grounded in equity and is designed to enable a trustee or creditors to avoid a transfer when the transferee received more from the debtor than the debtor received from the transferee. *Churchill*, 256 B.R. at 682 (Bankr. S.D.N.Y. 2000). It is not designed to turn every vendor into an insurer to creditors against corporate malfeasance. If the trustee could prevail on his constructive fraudulent transfer claim in this case, every party who

provides credit or sells goods could become in effect a guarantor of the debts of all purchasers who make inappropriate use of the goods purchased. That is not the law, nor should it be. Here, Mack received credit and the balance it owed was reduced with each payment to Capital One. It also got the supplies from Menards that it paid for. It received reasonably equivalent value from every view of the transactions.

The trustee has not pled facts that support the essential element of lack of reasonably equivalent value. Nor will the trustee be able to amend to fix this defect; the premise of his claim is faulty. His claim in Count 1 based on constructive fraud will be dismissed with prejudice.

3. Actual Fraud

Capital One also seeks dismissal of the fraudulent transfer claim based on actual fraud in Count 2 of the amended complaint. It argues that the trustee failed to allege a plausible claim with the particularity required by Rule 9(b).

The following standards apply to a motion to dismiss a fraud claim. Rule 8(a) of the Federal Rules of Civil Procedure requires a “short and plain statement of the claim showing that the pleader is entitled to relief.” Fed. R. Civ. P. 8(a); Fed. R. Bankr. P. 8. A complaint must clear “two easy-to-clear hurdles” to satisfy Rule 8(a). *E.E.O.C. v. Concentra Health Servs.*, 496 F.3d 773, 776 (7th Cir. 2007). First, the complaint must contain enough information to give the defendant “fair notice” of the claim. *Reger Dev’t. LLC v. Nat’l City Bank*, 592 F.3d 759, 764 (7th Cir. 2019). The complaint need not make detailed factual allegations but there must be at least some facts supporting each element of the claim. *Ashcroft v. Iqbal*, 556 U.S. 662, 678, 129

S.Ct. 1937, 1949-50 (2009). Second, the complaint must plausibly suggest that the plaintiff has a right to relief, raising that right above the speculative level. *Concentra*, 496 F.3d at 776.

Satisfying this standard requires “more than an unadorned, the-defendant-unlawfully-harmed-me accusation A pleading that offers . . . a formulaic recitation of the elements of a cause of action will not do.” *Id.* Put another way, “[t]hreadbare recitals of elements of cause of action, supported by mere conclusory statements, do not suffice.” *Id.* Plaintiffs may not “merely parrot the statutory language of the claims they are pleading . . . rather than providing some specific facts to ground those legal claims” *Brooks v. Ross*, 578 F.3d 574, 581 (7th Cir. 2009).

When alleging fraud, however, Rule 9(b) requires more. A plaintiff must “state with particularity the circumstances constituting fraud” Fed. R. Civ. P. 9(b); Fed. R. Bankr. P. 7009. Particularity means “the who, what, when, where and how: the first paragraph of any newspaper story.” *Katz v. Household Int’l, Inc.*, 91 F.3d 1036, 1040 (7th Cir. 1996). The particularity standard is “somewhat relaxed” for a bankruptcy trustee because he may lack information that the debtor would have. *See, e.g., In re Grube*, 500 B.R. 764, 776 (Bankr. C.D. Ill. 2013); *Marwil v. Oncale (In re Life Fund 5.1 LLC)*, No. 10-42, 2010 WL 2650024 (Bankr. N.D. Ill. June 30, 2010). Nevertheless, the trustee must still comply with the “who, what, when, where and how test” of particularity. *Life Fund 5.1*, 2010 WL 2650024 (fraudulent transfer claims filed by a trustee were dismissed for failure to plead the precise amount of the transfer, the date of the transfer, and the debtor from whose account the money was transferred).

Fraudulent intent may be shown through direct evidence or circumstantial evidence, often referred to as “badges of fraud.” As explained in *Friedrich v Mottaz*, “[d]irect proof of actual intent to defraud is not required—indeed, it would be hard to come by—and a trustee can

prove actual intent by circumstantial evidence.” 294 F.3d 864, 869-70 (7th Cir. 2002). Courts often look to “badges of fraud” as circumstantial evidence. *Id.* These “badges” include: whether the debtor retained possession or control of the property after the transfer, whether the transferee shared a familial or other close relationship with the debtor, whether the debtor received consideration for the transfer, whether the transfer was disclosed or concealed, whether the debtor made the transfer before or after being threatened with suit by creditors, whether the transfer involved substantially all of the debtor's assets, whether the debtor absconded, and whether the debtor was or became solvent at the time of the transfer. *Id.*

Capital One argues that the trustee’s actual fraud claim does not pass muster under these standards. It contends that the amended complaint contains only conclusory allegations about a fraudulent scheme to deplete Mack’s assets and that there are no allegations connecting that general scheme to the transactions with Capital One. The trustee responds that he has not only alleged badges of fraud that provide circumstantial evidence of actual fraud, he has alleged an “actual admission” of Mack’s fraudulent intent through the statement of Workman to Byce.

The trustee has stated a claim for actual fraud with particularity, but just barely. The lynchpin of his claim is the alleged threat by Workman to Byce that if American Residential did not renegotiate the Agreement, Mack “would transfer its assets to related entities for nothing in return to hinder American Residential’s ability to exercise its legal remedies as a creditor or otherwise.” Amended Complaint ¶ 32. The trustee has provided enough of the who, what, and when for this alleged statement to satisfy Rule 9(b).¹

¹The trustee also alleges another threat that Workman made to Byce - that Mack’s “special relationships with local authorities in Cook County and surrounding areas would prevent American Residential from exercising management and control over its properties.”

Capital One argues in reply that Workman's alleged threat does not match the trustee's allegations. Workman said that Mack would transfer its assets to related entities. Here, the payments were for legitimate credit card debt owed by Mack. Though the trustee did not have an opportunity to respond to this argument, he would undoubtedly say that Mack's purchase of goods that ultimately benefitted a different company is close enough to what Workman threatened to support his claim. The court agrees, but only because it must make all reasonable inferences in favor of the trustee.

Capital One also contends that this one alleged threat is insufficient to justify a fraud claim for many thousands of ordinary uses of the Capital One credit card. But the trustee supported his allegation about the Workman threat with various other allegations regarding the scheme to defraud. These allegations, described in more detail above, include that (1) the McClellands began creating many new entities to conduct the kind of business Mack had previously conducted, (2) they transferred real property owned by Mack to these new entities for no consideration, (3) Mack "drew down" on its own assets to benefit the other entities, (4) Mack paid contractors to do work on properties owned by the other entities, (5) Mack paid the loans of other entities, (6) Mack concealed all of these actions from American Residential by failing to provide the quarterly income statements required under the Agreement, and (7) the McClellands "extracted" at least \$10.7 million in cash from Mack and the other entities.

Amended Complaint ¶ 33. This alleged threat does not support the trustee's claim of actual fraud. First, it is not plausible that any owner of hundreds of properties would take this threat seriously. If anything, the implausibility of this alleged threat undermines the trustee's position that the other threat by Workman - that the Mack's assets would be gutted - should be taken seriously. Second, this threat does not fit the trustee's theory that Mack intended to defraud by depleting its assets in any event.

Some of these allegations could fall within the various badges of fraud discussed above.² None is made with any particularity or specifically connects the credit transactions with Capital One to the allegedly fraudulent scheme. But taken together, assuming they are true and making all reasonable inferences from them in favor of the trustee, the allegations in the amended complaint are just enough to allege a plausible claim for actual fraud with sufficient particularity to survive a motion to dismiss.

Capital One also points to various weaknesses and contradictions in the trustee's allegations that it contends undermine the plausibility of the claim. For example, up to half of the transactions described in Attachment B to the amended complaint occurred before the Workman threat in June 2014. The transactions go back to December 2012, when Mack's relationship with American Residential had just begun so Mack presumably had no fraudulent intent. And nothing in the complaint or the attachments distinguishes pre-threat transactions from post-threat transactions. The trustee has alleged, however, that the efforts to deplete assets began before the Workman threat. The court must assume this is true and make all reasonable inferences in favor of the trustee. The court need not make the unreasonable inference that Mack had fraudulent intent in December 2012, when it entered into its agreement with American Residential. It can reasonably be inferred, however, that Mack started acting with fraudulent intent at some point before or in June 2014. The court need not determine when that happened to conclude that the trustee stated a claim for at least some of the transactions alleged in the amended complaint.

²The allegations about the creation of new entities to hold newly purchased properties does not necessarily demonstrate a fraudulent intent, since the use of separate entities to hold different real properties is a widespread, legitimate business practice.

Capital One also contends that the \$700,000 of the transactions for supplies that were allegedly used in properties owned by American Residential further undercut the trustee's theory that Mack was trying to defraud American Residential. This is true. Yet the court must make inferences in favor of the trustee and concludes that there is enough to allege a plausible claim based on actual fraudulent intent despite the obvious contradictions in the facts alleged.

Finally, Capital One argues, in effect, that it is not possible to state a claim for fraudulent transfer based on actual fraud to recover the repayment of antecedent debt unless the payments were made as part of a Ponzi scheme or to a corporate insider. It cites the *B.E.L.T.* decision, in which the court stated that it was unaware of any case from Illinois or any other state that concludes that a repayment of a debt to a third party was made with actual intent to defraud. 403 F.3d at 478. The trustee responds with the same argument he made regarding the constructive fraud claim: that there was no contention in *B.E.L.T.* or the other cases cited by Capital One that the repaid debt itself was incurred with actual fraudulent intent. This is true, and while it makes no difference for a constructive fraud claim, it does matter for a claim based on actual fraud. The *B.E.L.T.* court stated that it found no cases concluding that a debt repayment was a fraudulent transfer based on actual fraud but it did not eliminate the possibility of such a claim being potentially valid. Instead, it analyzed the factual allegations in the complaint to determine if they stated a claim based on actual fraud. *Id.* The court concluded that the plaintiff failed to allege facts supporting any badges of fraud so it affirmed the district court's dismissal of the actual fraud claim. But the *B.E.L.T.* court's analysis recognized that it may be possible to state a fraudulent transfer claim based on actual intent to defraud even if the defendant provided value to the debtor by reducing debt. *See Brandt v. KLC Fin., Inc. (In re Equip. Acquisition Res., Inc.)*,

481 B.R. 422, 427 (Bankr. N.D. Ill. 2012) (explaining the differences between fraudulent transfer claims based on actual fraud versus constructive fraud).

The facts alleged in the amended complaint are not compelling but they are just sufficient for the trustee to proceed with his claim based on actual fraud. The motion to dismiss the claim in Count 2 against Capital One will be denied.

4. Affirmative Defense - For Value in Good Faith

Capital One also argues that both of the fraudulent transfer claims against it should be dismissed because the allegations in the amended complaint establish Capital One's affirmative defense that it gave value in good faith to Mack. Section 548(c) provides that a trustee cannot recover transfers that may otherwise be constructively or actually fraudulent if they were received "for value and in good faith." 11 U.S.C. § 548(c). Illinois law provides a similar defense under the IUFTA. 740 ILCS 160/9(a). As discussed above, § 548(d) provides that value includes the satisfaction of an antecedent debt.

Capital One is correct that the allegations of the complaint establish that it provided value for purposes of this affirmative defense. The trustee acknowledges that the payments to Capital One decreased Mack's debt. Capital One argues that the factual allegations in the amended complaint also demonstrate its good faith. It acknowledges that to establish a transferee's good faith, it must appear "that the circumstances surrounding the transfers at issue would not have placed a reasonable person on inquiry notice of the alleged fraud." *Equip. Acquisition Res.*, 481 B.R. at 429. It contends that the factual circumstances alleged in the complaint "establish" that nothing would have placed Capital One on notice of Mack's alleged fraudulent scheme. It points

to the factual allegations discussed above that undercut the trustee's actual fraud claim, including that Exhibit B shows 12,000 ordinary transactions over the course of more than four years with no discernable change in transactions over time.

It is true that the trustee has not even argued that Capital One did *not* take the payments in good faith and the circumstances described in the amended complaint are consistent with Capital One's contention regarding good faith. Usually, however, the merits of an affirmative defense cannot be decided on a motion to dismiss. A plaintiff need not preemptively plead facts negating an affirmative defense. *Xechem, Inc. v. Bristol-Myers Squibb Co.*, 372 F.3d 899, 901 (7th Cir. 2004); *Equip. Acquisition Res.*, 481 B.R. at 429. While it is possible to plead oneself out of court by pleading "all the ingredients of an impenetrable defense," *Xechem*, 372 F.3d at 901, the trustee has not gone quite that far here. Though the facts alleged in the amended complaint support Capital One's contention that the payments were received in good faith, the trustee has not alleged enough specific facts to make it an "impenetrable defense."

Capital One is not entitled to dismissal of the fraudulent transfer claims based on its affirmative defense that it took for value and in good faith.

5. Claims Against Menards

Capital One also argues that the trustee has not alleged any claims against Menards, which is not a party to Capital One's credit card agreement with Mack. Capital One contends that the trustee's allegations are focused solely on recovering the payments made to Capital One. The transfers described in Exhibit A to the amended complaint that the trustee seeks to recover were all made solely to Capital One. Menards is mentioned only in three places in the amended

complaint: (1) the first sentence, which states that Mack “transferred \$3,297,257.44 to Capital One N.A., Capital One Financial Corp, and Menard Inc. (collectively “Capital One”),” (2) Paragraph 13, which states that Menard Inc. is a chain of home improvement stores, and (3) Paragraph 14, which states: “[i]n partnership with Capital One N.A. and Capital One Financial Corp., Menard offers a credit card for use in its stores.”

Capital One is correct that the trustee has failed to allege any claims against Menards. As Capital One argues, a plaintiff cannot simply lump defendants together in all the allegations of the complaint. It must provide a factual basis to distinguish their conduct. *See, e.g., Ôchre LLC v. Rockwell Architecture Planning & Decisn, P.C.*, No. 12-cv-2837, 2012 WL 6082387, at *6 (S.D.N.Y. Dec. 3, 2012) (quoting *Atuahene v. City of Hartford*, 10 Fed. App’x 33, 34 (2d Cir. 2001)) (“Where a complaint names multiple defendants, that complaint must provide a plausible factual basis to distinguish the conduct of each of the defendants”). The trustee has failed to do this. There are no allegations of any transfers to Menards that the trustee seeks to recover. The trustee includes all three defendants - the two Capital One entities and Menards - in his “Capital One” defined term that he uses throughout the complaint as though they are the same or related entities. They are not. Menards is a separate corporation that is not related to the Capital One defendants. The trustee has alleged no factual or legal basis for holding Menards liable for the payments from Mack to Capital One that he seeks to recover.

The trustee responds that he has “provided what allegations he could” about Menards, referring to the three times that Menards is mentioned in the amended complaint. He then argues that “these events may be viewed as an integrated transaction.” Trustee Response, p. 15. But he alleged no “events” and there are no allegations about “integrated transactions.” And the trustee

cites no authority that recognizes such a theory in a fraudulent transfer claim. He cites only two cases that have nothing to do with fraudulent transfer law.

The trustee has not alleged any factual or legal basis for recovering from Menards. The entire complaint against Menards will be dismissed.

6. Conclusion

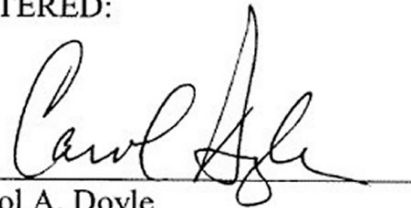
The trustee has failed to state a claim in Count 1 against Capital One for fraudulent transfer based on constructive fraud. The defects in the claim cannot be fixed through amendment so it will be dismissed with prejudice.

The motion to dismiss the claim in Count 2 against Capital One for fraudulent transfer based on actual fraud will be denied.

All three claims against Menards will be dismissed.

Dated: November 16, 2020

ENTERED:

A handwritten signature in black ink, appearing to read "Carol A. Doyle", written over a horizontal line.

Carol A. Doyle
United States Bankruptcy Judge